

**FILED**

March 31, 2020

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

**SEALED BY ORDER OF THE COURT****Dkt.# 383**

ADAM A. REEVES (NYBN 2363877)  
Attorney for the United States,  
Acting Under Authority Conferred By 28 U.S.C. § 515

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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	<b>CASE NO. 18-CR-00258 EJD</b>
	)	
Plaintiff,	)	<b>DECLARATION OF VANESSA BAEHR-JONES</b>
	)	<b>IN SUPPORT OF UNITED STATES' MOTION</b>
v.	)	<b>FOR EXAMINATION OF DEFENDANT</b>
	)	<b>ELIZABETH HOLMES PURSUANT TO</b>
ELIZABETH HOLMES and RAMESH	)	<b>FEDERAL RULE OF CRIMINAL PROCEDURE</b>
"SUNNY" BALWANI,	)	<b>12.2(c)</b>
	)	
Defendants.	)	<b><u>[FILED PROVISIONALLY UNDER SEAL</u></b>
	)	<b><u>PURSUANT TO COURT ORDER OF JANUARY</u></b>
	)	<b><u>13, 2020]</u></b>

I, Vanessa Baehr-Jones, declare:

- I am an Assistant United States Attorney (AUSA) representing the United States of America, the plaintiff in this case.
- On January 17, 2020, defense counsel for Defendant Elizabeth Holmes responded by letter to the government's request that she supplement her Notice Pursuant to Federal Rule of Criminal

DECL. OF VANESSA BAEHR-JONES  
18-CR-00258 EJD  
FILED UNDER SEAL

1 Procedure 12.2(b). Attached as Exhibit 1 is a true and correct copy of the January 17, 2020, letter.

2 3. On March 24, 2020, I sent a letter to defense counsel requesting Holmes participate in a  
3 government examination pursuant to Federal Rule of Criminal Procedure 12.2(c)(1)(B). Attached as  
4 Exhibit 2 is a true and correct copy of this March 24, 2020, letter.

5 4. Holmes responded on March 26, 2020, indicating that she would not submit to a  
6 government examination absent an order from the Court. Attached as Exhibit 3 is a true and correct  
7 copy of this March 26, 2020, letter.

8 5. On December 4, 2019, I sent a letter to defense counsel for defendant Elizabeth Holmes  
9 setting forth a proposed schedule for the procedures and litigation relating to defendant Holmes's  
10 anticipated Rule 12.2(b) defense. Attached as Exhibit 4 is a true and correct copy of this December 4,  
11 2019, letter.

12 6. I declare under penalty of perjury under the laws of the United States of America that the  
13 foregoing is true and correct and that this declaration is executed at Oakland, California, on March 31,  
14 2020.

15 DATED: March 31, 2020



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VANESSA BAEHR-JONES  
Assistant United States Attorney

# EXHIBIT 1

LAW OFFICES  
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EDWARD BENNETT WILLIAMS (1920-1988)  
PAUL R. CONNOLLY (1922-1978)

January 17, 2020

Via Email

Ms. Vanessa Baehr-Jones, Esq.  
Mr. John C. Bostic, Esq.  
Mr. Robert Leach, Esq.  
Mr. Jeffrey Schenk, Esq.  
Assistant United States Attorneys  
United States Attorney's Office  
Northern District of California  
150 Almaden Blvd, Suite 900  
San Jose, CA 95113

Re: United States v. Elizabeth Holmes and Ramesh "Sunny" Balwani, Case No. 18-CR-000258-EJD (N.D. Cal.)

Dear Counsel:

We write in response to your January 14, 2020 letter. We disagree with the assertion that the 12.2(b) notice is insufficient under the Rule. Nevertheless, in an effort to avoid unnecessary litigation, we provide the following information in response to your letter:

- Ms. Holmes has engaged Dr. Mindy Mechanic, whose CV is attached to this letter.<sup>1</sup>
- The Rule 12.2(b) notice provides the topics on which mental health evidence bearing on the issue of guilt may be offered: "If offered, the expert is expected to testify regarding: scientific research addressing intimate partner abuse, including vulnerability to intimate partner abuse, the dynamics of intimate partner abuse, and the psychological effects of an abusive relationship on its victims, both during and in the wake of an abusive relationship; whether and how Ms. Holmes' relationship with Mr. Balwani was consistent with intimate partner abuse; whether and how Ms. Holmes' psychological responses during and after the relationship were and are consistent with the typical reactions of victims of an abusive relationship; and Ms. Holmes' particular vulnerability to an abusive relationship, [REDACTED]"

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<sup>1</sup> Ms. Holmes is not required to provide the names of any potential defense experts at this time, and reserves the right to identify additional or alternative experts who are within the scope of her 12.2(b) notice.

WILLIAMS & CONNOLLY LLP

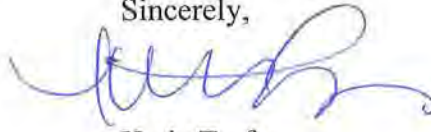
Ms. Vanessa Baehr-Jones, Esq., et al.

January 17, 2020

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- The forensic evaluation of Ms. Holmes noted in the 12.2(b) notice has consisted or will consist of semi-structured and structured interviews focused on the referral questions of whether Ms. Holmes suffered from intimate partner abuse in her relationship with Mr. Balwani during the period of the alleged conspiracy; if so, what was the nature and extent of the abuse; and the psychological effects of such abuse. The MMPI-2 test has been or will be administered on Ms. Holmes.

Sincerely,



Katie Trefz

NOVEMBER, 2019

*Curriculum Vitae*

**Mindy B. Mechanic**

President, Forensic Psychological Consulting, Inc.

Cell: [REDACTED]

Email: [REDACTED]

**Education**

**Ph.D.**

**University of Illinois at Urbana-Champaign, 1996**

Major: Clinical Psychology; Minor: Law

Dissertation: Battered Woman Syndrome: Juror Common Understanding and Expert Testimony

Clinical Internship, **University of Virginia** Health Sciences Center, 1990-1991  
(APA-Accredited Pre-doctoral Internship)

Rotations: Adult Psychiatric Clinic (major),  
Western State Hospital, Acute Admissions Unit (major),  
Forensic Psychiatry Clinic (extended minor)  
Family Stress Clinic (minor)  
Pain Management Center (minor)

**M.A.**

**University of Illinois at Urbana-Champaign, 1987**

Major: Clinical Psychology

Thesis: Assessment and Differentiation of Chronic Depression in a Non-Patient Sample

**B.A.**

**University of California, Los Angeles (Psychology), 1981**

**Professional Licenses**

March, 2019	Interjurisdictional Practice Certificate (IPC # 4712)
May, 2004	Licensed Psychologist, California (PSY 19660)
June, 1998	Licensed Psychologist, State of Missouri (PY 01885 -inactive)
July, 2000	Licensed Clinical Psychologist, State of Illinois (071-006086 –inactive)

**Certificates and Specialized Training:**

December, 2018	Basic FETI (Forensic Experiential Trauma Interview) Certification
August, 2017	APSAC Child Forensic Interviewing Certification
July, 2015	Certificate in Disaster Mental Health Fundamentals, American Red Cross
August, 2015	APA Training in Disasters and the Media

**Forensic Expertise:**

Interpersonal victimization (sexual assault, child maltreatment/adversity, intimate partner abuse, stalking, domestic homicide, infanticide, trauma and alcohol-related memory impairment);

impact of non-crime trauma (e.g., combat, accidents, disaster) on potentially criminal or harm-inducing behaviors towards others; risk assessment; workplace violence. Experienced working in criminal (military and civilian), civil, family, and juvenile courts.

### **Positions Held**

6/2010-  
Current  
on President, Forensic Psychological Consulting, Inc.  
Provides forensic evaluation, expert testimony, expert consultation and training trauma-related forensic psychology.

6/2013-  
10/2019 Professor of Psychology (RETIRED)  
California State University, Fullerton  
Department of Psychology

8/2008-  
7/2009 Visiting Scholar  
Whittier Law School

8/2006-  
8/2013 Associate Professor of Psychology  
California State University, Fullerton  
Department of Psychology

2002-  
7/2006 Assistant Professor of Psychology  
California State University, Fullerton  
Department of Psychology

1998-  
2002 Assistant Research Professor  
Center for Trauma Recovery/Department of Psychology  
University of Missouri-St. Louis

1996-  
1998 Post-doctoral Fellow  
Center for Trauma Recovery/Department of Psychology  
University of Missouri-St. Louis  
Supervised Post-Doctoral Clinical Training Program. Includes individual and couples therapy, clinical and forensic assessment with trauma and non-trauma populations. Conducted clinical assessments for the determination of disability.

October,  
1992-  
July, 1996 Project Director, NIMH Grant PTSD: Etiology and Treatment  
Patricia A. Resick, Principal Investigator  
Department of Psychology  
University of Missouri-St. Louis  
Trained and supervised graduate student interviewers conducting structured diagnostic interviews for DSM-IV disorder. Responsible for participant recruitment from community agencies and all aspects of data collection.

July, 1991-  
September,  
1992 Research Assistant: Coercion Project,  
The John D. and Catherine T. MacArthur Foundation Research  
Network on Mental Health and the Law.

Supervisors: S. K Hoge, M.D. and John Monahan, Ph.D.

Responsibilities: Participated in the design and implementation of research protocols. Assisted in the collection and analysis of statistical data. Cultivated and maintained relationships among the primary and satellite research sites.

## **Grants**

### **Federal Grants**

Principal Investigator, *Ethnocultural Influences on Women's Experiences of, and Responses to Intimate Partner Abuse*. (National Institute of Justice). \$925,100) Funded as of January, 2014.

Co-Investigator, *Translational Approaches to Understanding Sex-dependent Responses to Unpredictable Threat*. (National Institute of Health-NIMH), \$412,243.000 (under review).

Research Co-Leader, *Disparities in social support, isolation, and coping among cervical cancer survivors*. Joint pilot project proposed as part of the CSUF-UCI-CFCCC Partnership for Health Disparities Research (National Cancer Institute, funded, 2012), \$50,000.

Consultant, *Intimate Partner Violence in Mandatory Divorce Mediation: Longitudinal Outcomes from a Multi-Cultural Study* (2008), National Institute of Justice, \$226,031.

Principal Investigator, *Intimate Partner Abuse: Effects on Parenting*. Maternal and Child Health Bureau, HRSA (2003, not funded), \$1,199,159.

Principal Investigator, *Intimate Partner Abuse: Effects on Parenting*. Maternal and Child Health Bureau, HRSA (2002, approved for funding – not funded), \$750,000.

Co-Investigator. *Violence Against Women National Prevention Research Center*. Centers for Disease Control and Prevention (CDC, 1998), \$470,815.

Co-Principal Investigator, *Cognitive Processes in PTSD: Focus on Domestic Violence*. National Institute of Mental Health (NIMH, 1997), \$ 1,374,843.

Co-Principal Investigator, *Marital Violence in the Wake of the Great Flood of 1993*. National Institute of Mental Health (NIMH, 1993). NIMH Grant # 1 R03MH52513-01, \$71,266.

### **Internal and Foundation Grants**

Principal Investigator, *Universal Screening for Intimate Partner Violence in Routine Clinical Care* (May, 2015), California Wellness Foundation, \$20,000.

Principal Investigator, *Battering, Parenting and Culture Among Latina Mothers*. (July, 2012) CSUF College of Humanities and Social Sciences, Summer Stipend.

Principal Investigator, *PTSD and Intimate Partner Violence among Hispanic and Non-Hispanic women* (2011, funded). California State University, Grant Incentive Fund, \$10,000.



Principal Investigator, *Adaptation to Intimate Partner Violence Among Ethnic Minority Women*, (2011, funded, release time, \$1500). CSUF Health Promotion Research Mini-Grant.

Principal Investigator, *Intimate Partner Violence Against Latinas: Exploring Ethnic Differences in Psychological and Strategic Outcomes* (2008). State Fullerton State Special Fund For Research, Scholarship And Creative Activity Grants, \$4,950.

Principal Investigator, *Intimate partner violence and PTSD among Latinas* (2006). California State Fullerton State Special Fund for Research, Scholarship And Creative Activity Grants, \$4950.

Principal Investigator, *Partner violence and parenting among Latinas* (2004-2005). California State Fullerton State Special Fund For Research, Scholarship And Creative Activity Grants, \$4855.

Principal Investigator, *Domestic violence and workplace issues* (2004). California State University, Faculty Development Center Intramural Grants (release time).

Principal Investigator, *Domestic violence and workplace issues* (2004). California State University, Department of Psychology, IRR release award.

Principal Investigator, *The impact of intimate partner abuse on battered women's parenting* (2003). California State University, Intramural grant, State of California (summer salary)

Principal Investigator, *The impact of intimate partner abuse on battered women's parenting* (2002). California State University, Faculty Development Center Intramural Grants (release time).

Principal Investigator, *The impact of intimate partner abuse on battered women's parenting* (2002). California State University, Department of Psychology, IRR release award.

#### **Grant Consultation**

Consultant/Local Research Partner, *St. Louis County Domestic Violence and Child Maltreatment Demonstration Initiative* (HHS/DOJ) (April, 2001, funded).

Consultant, *Community-based curriculum for training nursing students in the health care needs of incarcerated women*, Helene Fuld Health Trust (2000, funded).

#### **Publications**

##### **Books**

Mechanic, M.B. (in progress). *Explaining victim behavior: Using expert psychological evidence to prosecute sexual assault, stalking and intimate partner violence cases.*

Mechanic, M.B. (in progress). *Criminal Cases Involving Battered Women Defendants*

*and Witnesses: Expert Evidence on Intimate Partner Battering and Its Effects*. Oxford University Press.

### **Journal Articles**

*(under review)*

Valdovinos, M., & Mechanic, M.B. (2019, under review). “Where mama duck goes, little ducklings follow”: Exploring the Parenting Experiences of Latina Intimate Partner Violence Survivors.

Dardis, C.M., Ahrens, C., Howard, R.L., & Mechanic, M.B. 2019, (under review). Experiences of Stalking Among a Diverse Sample of Intimate Partner Abuse Survivors

*(published)*

Valdovinos, M. G., & Mechanic, M. B. (2017). Sexual coercion in marriage: Narrative accounts of abused Mexican-American women. *Journal of Ethnic & Cultural Diversity in Social Work*. 1-20, Published online: 09 May 2017

Segal, N.L., Cortez, F.A., Zettel-Watson., L.E., Mechanic, M.B., Munson, J.E., Velázquez, J.M.A., & Reed, B. (2015). Genetic and experiential influences on behavior: Twins reunited at 78 years. *Personality and Individual Differences*, 73, 110-117.

Pfaendler, K., Wenzel, L., Mechanic, M.B., & Penner, K.R. (2015). Cervical cancer survivorship: Long-term quality of life and social support. *Clinical Therapeutics*, 37, 39-48.

Shepherd-McMullen, C., Stokes, J., Mearns, J., & Mechanic, M.B. (2015) Negative Mood Regulation Expectancies Moderate the Relationship between Psychological Abuse and Avoidant Coping. *Journal of Interpersonal Violence*. 30, 1553-1556

Daftary-Kapur, T., O'Connor, M., & Mechanic, M.B. (2014). Gender intrusive questioning: A survey of expert witnesses. *Behavioral Sciences and the Law*, 32, 180-194.

Mechanic, M.B., & Pole, N. (2013). Methodological Considerations in Conducting Ethnoculturally Sensitive Research on Intimate Partner Abuse and its Multidimensional Consequences, *Sex Roles*. 69, 205–225

Beck, C.J.A., Walsh, M.E., Mechanic, M.B. & Taylor, C.S. (2010). Intimate partner violence screening and accommodations provided in mandatory divorce mediation. *Law and Human Behavior*, 34 (3), 227-241.

Mechanic, M.B., Weaver, T.L., & Resick, P.A. (2008a). Mental health consequences of intimate partner abuse: A multidimensional assessment of four different forms of abuse. *Violence Against Women*, 14 (6), 634-654.

- Mechanic, M.B., Weaver, T.L., & Resick, P.A. (2008b). Risk factors for physical injury among help-seeking battered women: An examination of abuse dimensions. *Violence Against Women, 14* (10), 1148-1165.
- Marelich, W.D., Lundquist, J., Painter, K., & Mechanic, M. B (2008). Sexual Deception as a Social-Exchange Process: Development of a Behavior-Based Sexual Deception Scale. *The Journal of Sex Research, 45* (1), 27-35.
- Taft, C. T., Resick, P. A., Panuzio, J., Vogt, D. S., & Mechanic, M. B. (2007). Coping among Victims of Relationship Abuse: A Longitudinal Examination. *Violence and Victims, 408-418*.
- Taft, C. T., Vogt, D. S., Resick, P. A., & Mechanic, M. B. (2007). Posttraumatic stress disorder and physical health symptoms among help seeking battered women. *Journal of Family Psychology, 354-362*.
- Taft, C. T., Resick, P. A., Panuzio, J., Vogt, D. S., & Mechanic, M. B. (2007). Examining the correlates of engagement and disengagement coping among help seeking battered women. *Violence and Victims, 22* (1), 3-17.
- Segal, N.L., Seghers, J.P., Marelich, W.D., Mechanic, M., & Castillo, R. (2007). Social closeness of monozygotic and dizygotic twin parents toward their nieces and nephews. *European Journal of Personality, 487-506*.
- Griffin, M.G., Uhlmansiek, M.H., Resick, P.A., & Mechanic, M.B. (2004). Assessment of posttraumatic stress disorder in domestic violence survivors: Comparison of an interviewer-based versus a self-report measure, *Journal of Traumatic Stress, 17* (6), 497-503.
- Mechanic, M.B. (2004). Beyond PTSD: Mental health consequences of violence against women: A response to Briere and Jordan. *Journal of Interpersonal Violence, 18*, 1-7.
- Weaver, T.L., Chard, K.M., Mechanic, M.B., & Etzel, J.C. (2004). Self-injurious behaviors, PTSD arousal, and general health Complaints within a treatment-seeking sample of sexually abused women. *Journal of Interpersonal Violence, 19* (5), 558-575.
- Griffin, M.G., Resick, P.A., Waldrop, A., & Mechanic, M.B. (2003). Reactions to participation in trauma research: Is there evidence of harm? *Journal of Traumatic Stress 16*, 221-227.
- Bennice, J.A., Resick, P.A., Mechanic, M.B., & Astin, M. (2003). The relative effects of intimate partner physical and sexual violence on posttraumatic stress disorder symptomatology. *Violence and Victims, 18* (1), 87-94.
- Lee, R.K., Sanders-Thompson, V.L., & Mechanic, M.B. (2002). Intimate partner violence and

- women of color: A call for innovation. *American Journal of Public Health*, 92 (4), 530-534.
- Rose, S., & Mechanic, M. (2002). Homophobic bias crimes: An examination of crime features, psychological distress and help-seeking behavior. *American Behavioral Scientist*, 46\_(1), 14-26.
- Mechanic, M.B., Weaver, T.L., & Resick, P.A. (2000). Intimate partner violence and stalking behavior: Exploration of patterns and correlates in a sample of acutely battered women. *Violence and Victims*, 15 (1), 55-72.
- Reprinted in: K.E. Davis, I.H. Frieze, & R.E. Maiuro (Eds.) *Stalking and obsessive behavior: Perspectives on victims and perpetrators*. Springer Publications (2002), pp. 62-88.
- Reprinted in R. Maiuro (Ed.) *Perspectives on Stalking: Victims, Perpetrators, and Cyberstalking*. Springer Publications (2015), pp. 157-172.
- Mechanic, M.B., Uhlmansiek, M. H., Weaver, T.W., & Resick, P.A. (2000). The impact of severe stalking experienced by acutely battered women: An examination of violence, psychological symptoms, and strategic responding. *Violence and Victims*, 15, (4), 443-458.
- Reprinted in: K.E. Davis, I.H. Frieze, & R.E. Maiuro (Eds.) *Stalking and obsessive behavior: Perspectives on victims and perpetrators*. Springer Publications (2002), pp. 89-111.
- Lurigio, A.J., & Mechanic, M.B. (2000,). The importance of being sensitive and responsive to crime victims. *Police*, 24 (1), 22-28.
- Nishith, P., Mechanic, M.B. & Resick, P.A. (2000). Prior interpersonal trauma: The contribution to current PTSD symptoms in female rape victims. *Journal of Abnormal Psychology*, 109 (1), 20-25.
- Mechanic, M.B., Resick, P.A. & Griffin, M.G. (1998). A Comparison of Normal Forgetting, Psychopathology, and Information Processing Models of Reported Amnesia for Recent Sexual Trauma. *Journal of Consulting and Clinical Psychology*, 66 (6), 948-957.
- Mechanic, M.B. & Aber, M.S. (1997). O.J. Simpson: A threat to internal validity? *Journal of Social Issues*, 53 (3), 517-530.
- Griffin, M.G. ,Resick, P.A., Mechanic, M.B, and Evans, T. (1997). Psychophysiological and nonverbal assessment of peritraumatic dissociation in rape victims . *American Journal of Psychiatry*, 154, 1081-1088.
- Abramson, P.R., & Mechanic, M.B. (1983). Sex and the media: Three decades of best-selling

novels and major motion pictures. *Archives of Sexual Behavior*, 12, 185-206.

### **Contributing Author**

Moriarty, J.C. (1996). Psychological and scientific evidence in criminal trial. Thomson/West Publishers. [Contributed to Chapters 5 & 6, 2005/2006 Supplement].

### **Co-Editor**

Mechanic, M.B. (2015). *Encyclopedia of Mental Health*. Oxford, England: Elsevier Press.

### **Chapters in Edited Volumes**

Mechanic, M.B. (2011). Research on Intimate Partner Violence: Methodological and Ethical Considerations. In B. Rosenfeld and S. Penrod (Eds.) *Research Methods in Forensic Psychology*. New York: John Wiley Press (Chapter 26).

Davis, K.E., & Mechanic, M.B. (2009). Stalking victimization: The management of consequences. In C. Mitchell (Ed.) *Intimate Partner Violence: A Health-Based Perspective*. NY: Oxford University Press (Chapter 31).

Lyon, T., & Mechanic, M.B. (2006). Battered women and parenting. In. N. Dowd, D.G. Singer & R.F. Wilson (Eds.) *Handbook on children, culture and violence*. Newbury Park, CA: Sage Publications.

Mechanic, M.B. (2004). Stalking victimization and intimate partner violence. In T. Jackson & L. VandeCreek (Eds.) *Innovations in Clinical Practice: A sourcebook*. Sarasota, FL: Professional Resource Press, pp. 21-34.

Mechanic, M.B. (2003). Responding to the psychological impact of stalking. In M. Brewster (Ed.). *Stalkers and their Victims: Psychology, law, risk factors and interventions*. Kingston, N.J.: Civic Research Institute, Chapter 11, pp. 11\_1-11\_22.

Mechanic, M.B. (2001). Stalking Victimization: Clinical implications for assessment and intervention. in K.E. Davis, I.H. Frieze & R.E. Maiuro (Eds.) *Stalking and obsessive behavior: Perspectives on victims and perpetrators*. Springer Publications. pp. 31-61.

Mechanic, M.B. (1996). Battered women, homicide and the legal system. In A.R. Roberts (Ed.) *Helping battered women: New perspectives and remedies*. New York: Oxford University Press, pp. 132-156.

Resick, P.A., & Mechanic, M.B. (1995). Brief cognitive therapies for rape victims. In A.R. Roberts (Ed.) *Crisis Intervention and Time limited Treatment*. Newbury Park, CA: Sage Publications. pp. 91-126.

### **Other Publications**

Mechanic, M.B. (2018, in press). *Risk Management Strategies for Dealing with Sexual Misconduct in the Workplace*. *The National Psychologist*.

- Mechanic, M.B. (2006). Needs of marginalized battered women. *Domestic Violence Report*, 11 (5), 65-66; 79-80.
- Mechanic, M.B. & Valdovinos, M. (2006), Multicultural perspectives on Intimate partner violence. *Domestic Violence Report*, 11 (3), 39-40.
- Mechanic, M.B. & Valdovinos, M. (2005). More effects of intimate partner abuse on Hispanic Victims. *Domestic Violence Report*, 10 (6), 87-88.
- Mechanic, M.B., & Valdovinos, M (June/July, 2005). The cultural context of abuse of Latinas. *Domestic Violence Report*, 10 (5), 65-67.
- Mechanic, M.B., & Valdovinos, M. (February/March, 2005). Intimate partner abuse in same-sex relationships. *Domestic Violence Report*, 10 (3), 38,41.
- Mechanic, M.B., & Valdovinos, M. (October/November, 2004). Intimate partner abuse experienced by Latinas: Part III. *Domestic Violence Report*, 10 (1), 16.
- Mechanic, M.B., & Valdovinos, M. (June/July, 2004). Intimate partner abuse experienced by Latinas: Part II. *Domestic Violence Report*, 9 (5), 69,73-76.
- Tang-Martinez, Z., Mechanic, M. B. (2001). A Natural History of Rape: Biological Bases of Sexual Coercion, *American Anthropologist*, 103, (4) 1222-1223. (book review).
- Mechanic, M.B, (2001). Autonomous Intimacy: Oxymoron or Necessary Precondition? *Psychology of Women Quarterly*, 25 (2), 169-170. Review of *The Search for Autonomous Intimacy: Sexual Abuse and Young Women's Identity Development*, M. Sue Crowley. NY: Peter Lang Publishing, 2000. 256 pp. (book review)
- Tang-Martinez, Z., & Mechanic, M.B. (May/June 2000). Response to Thornhill and Palmer on Rape. The Sciences: NY Academy of Sciences, page 3 (letter).
- Technical Reports
- Beck, C.J.A, Walsh, M.E., Mechanic, M.B. Figuerido, A.J., & Mui-Kang, C. (2011). *Intimate partner abuse in mandatory custody mediation: Outcomes from a long-term multicultural study*. Final report, submitted to the National Institute of Justice, grant number 2007-WG-BX-0028.
- Mechanic, M.B., Sanders-Thompson, V., Shields, N., & Lee, R. (2003). *Violence against women prevention programming: A national survey of programs in use*. St Louis, MO: National Violence Against Women Prevention Research Center, University of Missouri-St. Louis.
- Mouradian, V.E., Mechanic, M.B., & Williams, L.M. (2001). *Recommendations for establishing and maintaining successful researcher-practitioner collaborations*. Wellesley, MA: National Violence Against Women Prevention Research Center, Wellesley College.



National Violence Against Women Prevention Research Center (May, 2001). *Fostering collaborations to prevent violence against women: Integrating findings from practitioner and researcher focus groups*. Charleston, SC. (Co-Author).

Resick, P. A., Mechanic, M. B., & Griffin, M. G. (1997). *Marital violence in the wake of the great flood of 1993*. Final report submitted to the National Institute of Mental Health, Grant #1 R03MH52513-01.

### **Manuscripts In Preparation**

Mechanic, M.B., Weaver, T.L., & Resick, P.A. (in preparation). Subtypes of stalking among women exposed to intimate partner violence: A cluster analytic approach.

Mechanic, M.B., Resick, P.A., & Griffin, M.G. (in preparation). The roles of partner abuse, cognitive schemas, and emotional disengagement as contributors to PTSD and depression among battered women. Poster submitted to the 98<sup>th</sup> Annual Convention of the Western Psychological Association, Portland, OR

### **Unpublished Instruments**

Mechanic, M.B. (unpublished measure) Cognitive Distortion Index.

Klein, D.N., Mechanic, M.B., & Miller, G.A. (unpublished instrument) A modified structured diagnostic interview.

### **Professional Presentations (peer-reviewed)**

Lemon, N., Flanagan, T., & Mechanic, M.B. (2019, February). *Current developments in domestic violence law: Cases, statutes, threat assessment/management and the psychology behind it all*. Association of Family and Conciliation Courts Annual CA Conference, Costa Mesa, CA.

Hart, A., Escobar, M., Altamranio, V., Ahrens, C., & Mechanic, M.B. (2018, September). *Reasons why women of Mexican Heritage stay in abusive relationships*. Poster presented at the Institute on Violence and Trauma Conference, San Diego, CA.

Kim, M., Yoo, D., Lee, S., Aherns, C., & Mechanic, M.B. (2018, September). *Reasons why women of Mexican Heritage stay in abusive relationships*. Poster presented at the Institute on Violence and Trauma Conference, San Diego, CA.

Nguyen, J., Salazar, C., Prideaux, J., Gearhart, C., Ahrens, C., & Mechanic, M.B. (2018, September). *Reasons why women of Vietnamese heritage stay in their abusive relationships*. Poster presented at the Institute on Violence and Trauma Conference, San Diego, CA.

Vieira, J., Pattison, J., Stanger, A., Aherens, C., & Mechanic, M.B. (2018, September). *Reasons why European heritage women stay in abusive relationships*. Poster

presented at the Institute on Violence and Trauma Conference, San Diego, CA.

Hart, A., Rodriguez, P., Gamez, E., Nunez-Jimenez, A., Mendoza, V., Gearhart, C., Ahrens, C., & Mechanic, M. (2018, August). *Mexican-American survivors' recommendations for service providers*. Poster presented at the 126<sup>th</sup> Annual Convention of the American Psychological Association, San Francisco, CA.

Yoo, D., Kong, E., Salazar, C., Lopez, J., Gearhart, C., Ahrens, C., & Mechanic, M. (2018, August). *Korean-American survivors' recommendations for service providers*. Poster presented at the 126<sup>th</sup> Annual Convention of the American Psychological Association, San Francisco, CA

Nguyen, P., Mechanic, M., & Ahrens, C. (2018, August). *Vietnamese-American students' judgment of dating and marital violence: A pilot study*. Poster presented at the Annual Convention of the American Psychological Association, San Francisco, CA.

Nguyen, P., Phan, S., Escobar, M., Gearhart, C., Ahrens, C., & Mechanic, M. (2018, August). *Vietnamese-American survivors' recommendations for service providers*. Poster presented to the 126<sup>th</sup> Annual Convention of the American Psychological Association, San Francisco, CA.

Russo, L., Liner, L., Freiborg, N., Pattison, J., Gearhart, C., Ahrens, C., & Mechanic, M. (2018, August). *Intimate partner violence survivors' recommendations for service providers*. Poster presented at the 126<sup>th</sup> Annual Convention of the American Psychological Association, San Francisco, CA

Mechanic, M.B., Richards, K., & Rosenfeld, B. (2018, June). *Litigating sexual misconduct claims in the post-Weinstein #Me Too era*. Round Table Discussion presented at the International Forensic Mental Health Services Conference, Antwerp, Belgium

Ahrens, C., Gearhart, C., & Mechanic, C. (2018, May). *Barriers to accessing services among Vietnamese survivors of intimate partner violence*. In C. Ahrens (Chair), Designing research and services for underserved populations: Challenges and recommendations. Symposium presented at the 98<sup>th</sup> Annual Convention of the Western Psychological Association, Portland, OR.

Hart, A., Escobar, M., Pattison, J., Gearhart, C., Ahrens, C., & Mechanic, M. (2018, May). *'El Silencio': Understanding the influence of culture on the Mexican – American Woman's experience of abuse disclosure*. Poster presented at the 98<sup>th</sup> Annual Convention of the Western Psychological Association, Portland, OR.

Mendoza, V., Lopez, J., Nguyen, A., Ruiz, R., Phan, S., Gearhart, C., Ahrens, C., & Mechanic, M. (2018, May). *Social responses from friends and family upon intimate partner violence disclosure for Vietnamese American women*. Poster presented at the 98<sup>th</sup> Annual Convention of the Western Psychological Association, Portland, OR.

Russo, L., Nguyen, P., Salazar, C., Liner, L., Gearhart, C., Ahrens, C., & Mechanic, M. (2018,



May). *Social responses toward Korean American survivors of intimate partner violence*. Poster presented at the 98<sup>th</sup> Annual Convention of the Western Psychological Association, Portland, OR.

Nguyen, P., Mechanic, M.B., & Ahrens, C.A. (2018, April). *The influence of acculturation, patriarchal beliefs, and attitudes towards women on Vietnamese-American students perceptions of intimate partner violence*. Poster presented at the 98<sup>th</sup> Annual Convention of the Western Psychological Association, Portland, OR.

Mechanic, M.B. *Expert evidence on counterintuitive victim behavior in cases involving intimate partner and sexual violence: Conceptualizing victim responses through an interpersonal rather than a criminological lens* (2017, October). Paper presented at “Safer Communities, Safer Relationships,” Conference, Prato, Italy.

Gearhart, C., Light, L., Ahrens, C., & Mechanic, M. (2016, October). *Working with diverse survivors of intimate partner violence*. Poster presented at the Orange County Women’s Health Conference, Fullerton, CA.

Mechanic, M.B. (March, 2017). *Research, teaching, and forensic practice on violence against women: A translational science example* In M.B. Mechanic (Chair), *From the Laboratory to the Courtroom: An Exploration of Translational Psychology in the Field of Psychology and Law*. Symposium presented at American Psychology Law Society. Seattle, WA.

Mechanic, M.B., *intimate partner violence in child custody and visitation cases*. Annual Meeting of the California Association of Family and Conciliation Courts. Costa Mesa, CA, February, 2017.

Ari, S., Altamirano, V., Rodriguez, P., & Ahrens, C. (2017, January). *Mexican migrant survivors’ reasons for staying in or leaving abusive relationships*. Poster presented at the 2017 National Multicultural Conference and Summit, Portland, OR.

Gearhart, C., Light, L., Ahrens, C., & Mechanic, M. (2016, October). *Working with diverse survivors of intimate partner violence*. Poster presented at the Orange County Women’s Health Conference, Fullerton, CA.

Mechanic, M.B. (August, 2016). Discussant. In C. Beck (Chair), *Researcher-community partnerships: making complex relationships work*. Symposium presented at the Annual Meeting of the American Psychological Association, Denver, CO

Gomez, A., Morales, M., Gearhart, C., & Ahrens, C. (2016, March). *Measuring intimate partner violence among Mexican immigrant women: A mixed method pilot study*. Poster presented at the 5<sup>th</sup> Annual Latino Health Equity Conference.

Mechanic, M.B. (April, 2016). *Using research on violence against women in legal cases involving victims of sexual assault, stalking, and intimate partner abuse*. In C. Ahrens (chair), *Translational research to address violence against women*. Paper presented at the

Annual Meeting of the Western Psychological Association, Long Beach, CA.

- Mechanic, M. B. (March, 2016). *Social framework testimony on counterintuitive victim behaviors in trials for sexual assault*. In M. Mechanic (Chair) Social framework evidence in court: Contributions and controversies from five Areas of psycholegal research. Paper presented at the American Psychology Law Society Conference, Atlanta, GA.
- Ahrens, C., Mechanic, M.B., & Fehler-Cabral, G., (August, 2015). *Researching intimate partner violence in the Vietnamese and Korean-American community*. In M. Mechanic (Chair). Trauma and Resilience Among Diverse Survivors of Violence Against Women and Girls. Paper presented at the Annual Meeting of the American Psychological Association, Toronto, Canada.
- Mechanic, M.B. (March, 2015). Discussant. (March, 2015). In R. Davidson (Chair), *Researcher-Community Agency Partnerships: Practical for Making Complex Relationships Work*. Symposium presented at the Annual Meeting of the American-Psychology Law Society, San Diego, CA.
- Teutscher, J.M., Mechanic, M.B., Goetz, A.T., & Preston, K.S.J. (2014, November). *Victimization history and its effect on women's use of rape avoidance behaviors*. Poster presented at the International Society for Traumatic Stress Studies, Miami, FL
- Mechanic, M.B. (2014, June). *Expert Testimony in Cases involving Trauma, Violence, or Victimization*. In M. O'Connor (Chair), Panel Discussion, Achieving Effective Advocacy through Training Lawyers in Relevant Psychological. Society for the Psychological Study of Social Issues (SPSSI) Biennial Conference (Portland, OR).
- Mechanic, M.B. (2014, April). *Examining the cultural context of Intimate Partner Violence*. Paper presented at the Annual Meeting of the Western Psychological Association (Portland, OR)
- Mechanic, M.B., Griffin, M.G., Newton, T., Gahn, R., & Resick, P.A. (2013, November). *The Impact of Intimate Partner Stalking on PTSD and Psychophysiological Reactivity in Survivors of Intimate Partner Violence*. Paper presented at Annual Meeting of the International Society for Traumatic Stress Studies, Philadelphia, PA.
- Osann, K., Mechanic, M.B., Hsieh, S., Nelson, E., & Wenzel, L (2013, October). *Social Support and Coping among Hispanic and non-Hispanic Women participating in a Randomized Counseling Trial for Cervical Cancer Survivors*. Paper presented at Annual Meeting of the International Society for Quality of Life Research (Miami, FL).
- Mechanic, M.B., & Pole, N. (2013, March). *Conducting Ethnoculturally Sensitive research on Psycholegal Topics: Intimate Partner Violence as an Exemplar*. In C. Beck (Chair).

Conceptual/methodological Issues in Culturally Responsive Psycholegal Research: Four Empirical Illustrations of Intimate Partner Violence Research. Paper presented at the American Psychology-Law Society, Portland, OR.

Beck, C., Mechanic, M.B., & Davidson, R.D. (2013, March). *Ethnic differences in couple-level patterns of intimate partner violence in divorcing parents mediating custody and parenting time disputes*. In C. Beck (Chair). Conceptual/methodological Issues in Culturally Responsive Psycholegal Research: Four Empirical Illustrations of Intimate Partner Violence Research. Paper presented at the American Psychology-Law Society, Portland, OR.

Mechanic, M.B., Valdovinos, M.G., & Pedroza, V. (2012, November). *Discriminating service utilization patterns among severely battered women*. Paper presented at the Association for Behavior and Cognitive Therapy, Baltimore, MD.

Shepherd-McMullin, C.E., Mearns, J., Stokes, J., & Mechanic, M.B. (2012, April). *Negative mood regulation expectancies moderate psychological abuse on avoidant coping*. Poster presented at the annual Meeting of the Western Psychological Association, San Francisco, CA.

McIndoo, C.C., Scher, C.D., Mechanic, M.B., & Gerkens, D.R. (2011, November). *An investigation of cognitive interference: Intrusive words recalled by individuals with and without a history of physical assault following an emotional Stroop task*. Poster presented at the annual meeting of the Association for Behavioral and Cognitive Therapies, Toronto, ON Canada.

Gravel, K. L., Scher, C. D., Miller, S., & Mechanic, M. B. (2009, April). *The effects of looming vulnerability on test anxiety and performance*. Poster presented at the annual meeting of the Western Psychological Association.

Mechanic, M.B. (April, 2008). *The use of experiential learning approaches in teaching about trauma*. In M.B. Mechanic (Chair), Teaching Trauma: Experiential Methods, Pedagogy and Pitfalls, Symposium presented at the annual meeting of the Western Psychological Association Conference, Irvine, CA.

Beck, C.J.A., & Mechanic, M.B. (March, 2008). *Intimate partner violence screening and accommodations provided in mandatory divorce mediation*. Paper presented at the American Psychology Law Society Meeting, Jacksonville, FL.

Daferty, T., O'Connor, M., & Mechanic, M.B. (2007, August). *Gender intrusive questioning of expert witnesses*. Poster presented at the Annual Meeting of the American Psychological Association Convention, San Francisco, CA.

Kloeppel, E., Mechanic, M.B., Marelich, W., & Blackman, M. (2007, March). *Workplace disclosure of intimate partner abuse: An examination of supervisor and coworker support*. In C. Ahrens (Chair), Silenced: non-disclosure among survivors of interpersonal

violence. Symposium presented at the 32nd Annual meeting of the Association of Women in Psychology, San Francisco, CA.

Segal, N.L., Seghers, J.P., Marelich, W.D., Chavarria, K., & and Mechanic, M. (May, 2007) A twin-family study of social closeness: Aunts, uncles, nieces and nephews. Human Behavior and Evolution Society, Williamsburg, VA. (research symposium)

Mechanic, M.B. (2006, October). *Teaching trauma: The use of student documentaries as an experiential tool*. In T.L. Weaver (Chair). Experiential learning: Ways of engaging undergraduate and graduate students in trauma education. Panel presented at the 22<sup>nd</sup> Annual meeting of the International Society for Traumatic Stress Studies, Hollywood, CA.

Segal, N.L., Seghers, J.P., Chavarria, K., Marelich, W., Mechanic, M. B. & Castillo, R. (2006, May). *Social closeness between twin parents and their nieces and nephews*. American Psychological Society, New York City, NY.

Segal, N.L., Seghers, J.P., Chavarria, K., Marelich, W. & Mechanic, M.(2006, June). *Social closeness and gift-giving to nieces and nephews: A twin-family study*. Human Behavior and Evolution Society, Philadelphia, PA.

Valdovinos, M. G., & Mechanic, M.B. (2006, April). *Parenting among abused Latinas: Results from a qualitative study*. In M.B. Mechanic (Chair) Intimate Partner Violence Among Latinos: The Role of Cultural Context. Symposium presented to the 86<sup>th</sup> Annual Meeting of the Western Psychological Association.

Mechanic, M.B., Seghers, J., Marelich, W., & Resick, P. A. (2006, March). *Stalking and intimate partner violence; Identification of homogenous subgroups*. In C. Sinclair (Chair) Advances in research on stalking. Symposium presented at the American Psychology Law Society, St. Petersburg, FL.

Panuzio, J., Taft, C. T., Resick, P. A., Vogt, D. S., & Mechanic, M. B. (2005, November). *Coping and mental health among battered women*. Poster presented at the annual meeting of the Association for Behavioral and Cognitive Therapies, Washington, DC.

Panuzio, J., Taft, C. T., Resick, P. A., Vogt, D. S., & Mechanic, M. B. (2005, November). *Examining correlates of engagement and disengagement coping among battered women*. Poster presented at the annual meeting of the Association for Behavioral and Cognitive Therapies, Washington, DC.

Seghers, J., Mechanic, M., Marelich, W., & Resick, P.A. (2005, November). *Identification of homogenous sub-groups of battered women*. Poster presented at the International Society of Traumatic Stress Studies, Toronto, Canada

- Mechanic, M.B., Weaver, T.L., & Resick, P.A. (2005, November). *Stalking as a contributor to PTSD and depression among battered women*. Poster presented at the International Society of Traumatic Stress Studies, Toronto, Canada.
- Valdovinos, M., & Mechanic, M.B. (2005, July). *An exploration of marital sexual coercion and machismo among Latina women*. Paper presented at the 9<sup>th</sup> International New Family Violence Research Conference, Durham, New Hampshire.
- Valdovinos, M., Pedroza, V., Mechanic, M.B., & Resick, P.A. (2005, April). *Sheltered vs. nonsheltered battered women: An examination of cluste-based subtypes*. Poster presented at the Annual Meeting of the Western Psychological Association, Portland, OR.
- Mechanic, M.B., Weaver, T.L., & Resick, P.A. (2005, March) *The unique role of stalking as a predictor of physical injuries, PTSD, and depression among battered women*. In M.B. Mechanic (Chair), *Stalking: New directions in Research on Definitions, Victim Response and Offender Treatment*, Symposium presented at the Annual Meeting of the American Psychology-Law Society, San Diego, CA.
- Shaked, N., & Mechanic, M.B. (2005, March). *Juror bias in capital trials: Reducing racial bias by means of instruction modification*. Poster presented at the Annual Meeting of the American Psychology-Law Society, San Diego, CA.
- Valdovinos, M. & Mechanic, M.B. (October, 2004). *An exploration of marital sexual coercion and machismo among Latina women*, Poster presented at the 12<sup>th</sup> Annual Mental Health and Cultural Competency Summit, Anaheim, CA.
- Taft, C.T., Resick, P.A., Mechanic, M.B., & Vogt, D.S. (November, 2004). *PTSD and Physical Health Among Help-Seeking Battered Women*. Paper presented at the International Society of Traumatic Stress Studies, New Orleans, LA.
- Valdovinos, M., Harris, D., Mechanic, M.B., Marelich, W., & Resick, P.A. (April, 2004,). *Patterns of stalking in battered women*. Poster presented at Western Psychological Association, Phoenix, AZ.
- Beck, C. J. A., Walsh, M., Taylor, C., & Mechanic, M. (April, 2004). *Domestic Violence in Couples Mandated to Attend Divorce Mediation*. Presented at Arizona Governor Janet Napolitano's "Ending Domestic Violence State-wide Training Conference", Scottsdale, AZ.
- Harris, D., Valdovinos, M., Mechanic, M.B., Marelich, W.D., & Resick, P.A. (April, 2004). *Mental health effects of stalking and intimate partner violence*. Poster presented at Western Psychological Association, Phoenix, AZ.
- Mechanic, M.B., Castillo, R. Marelich, W., & Resick, P.A. (March, 2004). *The functional role of*



- cognitive distortions among battered women*. In. T. Nichols (Chair), *Exiting Abusive Intimate Relationships: Assessment of Challenges and Outcomes*. Symposium presented to American Psychology Law Society, Scottsdale, AZ.
- Beck, C., Walsh, M., Mechanic, M.B. & Taylor C. (March, 2004). *Domestic Violence in Couples Court-Mandated to Attend Divorce Mediation*. In. T. Nichols (Chair), *Exiting Abusive Intimate Relationships: Assessment of Challenges and Outcomes*. Symposium presented to American Psychology Law Society, Scottsdale, AZ.
- Mechanic, M.B., Marelich, W., & Resick, P.A. (March, 2004). *Assessment of stalking as a risk factor for escalated violence among battered women*. In M. O'Connor (Chair), *Research on risk factors associated with stalking: Victim and offender perspectives*. Symposium presented at the American Psychology Law Society, Scottsdale, AZ.
- Mechanic, M.B., Castillo, R., Marelich, W., & Resick, P.A. (October, 2003). *Cognitive distortion index: A measure of survival-based alterations in cognitions among battered women*. Toward a national research agenda on violence against women: A national research conference. University of Kentucky Center for Research on Violence Against Women, Lexington, KY.
- Mechanic, M.B. (October, 2003). *Mental health effects of victimization: Current Research Directions*. Toward a national research agenda on violence against women: A national research conference. University of Kentucky Center for Research on Violence Against Women, Lexington, KY.
- Lee, R., Shields, N., Sanders, V., & Mechanic, M.B. (April, 2003). *Violence against women prevention programming: Who we are and what we use*. Paper presented at the Annual meeting of the Midwest Sociological Society, Chicago, IL.
- Mechanic, M.B., & Resick, P.A. (November, 2002). *Coping and chronic violence exposure: The relationship between spontaneous and effortful avoidant strategies*. In S. Lewis (Chair). *Coping and service utilization for victims of chronic domestic assault*. Symposium presented at the 18<sup>th</sup> Annual Meeting of the International Society for Traumatic Stress Studies, Baltimore, MD.
- Waldrop, A., Resick, P., & Mechanic, M. B. (November, 2002). *Coping with violence: Battered women's perspectives on helping sources*. In S. Lewis (Chair). *Coping and service utilization for victims of chronic domestic assault*. Symposium presented at the 18<sup>th</sup> Annual Meeting of the International Society for Traumatic Stress Studies, Baltimore, MD.
- Griffin, M.G., Resick, P.A., & Mechanic, M.B. (November, 2002). *Psychophysiological reactivity in domestic violence victims*. In J. Hopper (Chair). *Biology research on PTSD: Addressing complexity and clinical issues*. Symposium presented at the 18<sup>th</sup> Annual Meeting of the International Society for Traumatic Stress Studies, Baltimore, MD.

- Mechanic, M.B., Kaysen, D.L., & Resick, P.A. (March, 2002). *Stalking, perceptions of lethality, and posttraumatic responding among recently battered women*. In M.B. Mechanic (Chair) "I'll be watching you:" Legal, clinical and social policy implications of recent stalking research. Symposium presented at the American-Psychology Law Society (APLS) Association Biennial Meeting, Austin, TX.
- Mechanic, M.B., & Resick, P.A. (December, 2001). *Mental health consequences of multiple forms of partner abuse*. In M.B. Mechanic (Chair) Multiple dimensions of partner abuse: Physical and mental health outcomes. Symposium presented at the 17<sup>th</sup> Annual Meeting of the International Society for Traumatic Stress Studies (New Orleans, LA).
- Mechanic, M.B., & Rose, S. (December, 2001). *Hate crime victimization: Help-seeking, disclosure, and symptom status*. Poster presented at the 17<sup>th</sup> Annual Meeting of the International Society for Traumatic Stress Studies (New Orleans, LA).
- Mechanic, M.B., & Resick, P.A. (December, 2001). *Violence against women researcher-practitioner collaboration: Findings from practitioner focus groups*. In D.G. Kilpatrick (Chair) How the National Violence Against Women Prevention Research Center helps researcher-community collaboration. Workshop presented at the 17<sup>th</sup> Annual Meeting of the International Society for Traumatic Stress Studies (New Orleans, LA).
- Mechanic, M.B., & Resick, P.A. (August, 2001). *Fostering collaborations to prevent violence against women: Findings from practitioner focus groups*. In D.G. Kilpatrick (Chair) Can violence against women researchers and practitioner—advocates just get along? Paper presented at the annual American Psychological Association Convention (San Francisco, CA).
- Resick, P.A., & Mechanic, M. B. (2001, July). *Types of abuse, cognitive schemas and dissociation among battered women*. In C.R. Brewin (Chair) Dissociative processes in psychopathology: Clinical Applications. Paper presented at the World Congress of Behavioral and Cognitive Therapies, Vancouver, British Columbia.
- Mechanic, M.B., & Resick, P.A. (2000, November). *Cognitive distortion index: Assessment of abuse-related cognitions among battered women*. Poster presented at the 16<sup>th</sup> Annual Meeting of the International Society for Traumatic Stress Studies, San Antonio, TX.
- O'Connor, M. & Mechanic, M.B. (2000, June). *A Broader exploration of the role of gender in expert testimony*. In M. O'Connor (Chair) Sex of the expert: An empirical and experiential view. Paper presented at the Society for the Psychological Study of Social Issues, Minneapolis.
- Resick, P.A., Nishith, P., Griffin, M., Mechanic, M., & Weaver, T.L. (2000, March,). *PTSD and depression comorbidity: Prospective study and treatment outcome results*. Paper presented at the 3rd World Congress for the International Society for Traumatic Stress Studies, Melbourne, Australia.

- Mechanic, M.B., Weaver, T.L., & Resick, P.A. (1999, November). *Intimate partner violence and stalking behavior: Exploration of patterns and correlates in a sample of acutely battered women*. Paper presented at the 15th Annual Meeting of the International Society for Traumatic Stress Studies, Miami.
- Griffin, M.G., Resick, P.A., & Mechanic, M.B. (1999, November). *Psychophysiological alterations related to peritraumatic dissociation in domestic violence victims*. Paper presented at the 15th Annual Meeting of the International Society for Traumatic Stress Studies, Miami.
- Grubaugh, A., Waldrop, A., Mechanic, M.B., & Resick, P.A. (1999, November). *Alternative and investment as predictors of domestic violence victims self-schemas*. Poster presented at the 15th Annual Meeting of the International Society for Traumatic Stress Studies, Miami.
- Rose, S., & Mechanic, M. (1999, October). *Homophobic bias crimes: An examination of crime features, psychological distress and helpseeking behavior*. Hate Crimes Conference sponsored by UCLA and the Society for the Psychological Study of Social Issues (SPISSI), Los Angeles, CA.
- Williams, A.M., & Mechanic, M.B. (1998, November). *The disruption of meaning: An analysis of schema change in sexual assault survivors with PTSD*. Poster presented at the 32nd Annual Convention of the Advancement for Behavior Therapy, Washington, D.C.
- Feuer, C., Mechanic, M.B. & Resick, P.A. (1998, November). *ASD and PTSD in sexual and physical assault survivors*. Paper presented at the Fourteenth Annual Meeting of the International Society for Traumatic Stress Studies, Washington, D.C.
- Evans, T.W., Uhlmansiek, M.H., Resick, P.A., Griffin, M.G., & Mechanic, M.B. (1998, November). *The effects of disaster-related damage, social support, coping and PTSD on distressed and nondistressed dyads following the great flood of 1993*. Poster presented at the Fourteenth Annual Meeting of the International Society for Traumatic Stress Studies, Washington, D.C.
- Mechanic, M.B., Resick, P.A., Griffin, M.G., & Astin, M.C. (1997, November). *Development of a measure to assess cognitive distortions in battered women*. Paper presented at the 31st. Annual Convention of the Advancement of Behavior Therapy, Miami, Fla.
- Resick, P.A., Mechanic, M.B., & Griffin, M.G. (1997, November). *Cognitions and recovery in rape and assault victims: A prospective study*. Paper presented at the 31st. Annual Convention of the Advancement of Behavior Therapy, Miami, Fla.
- Nishith, P., Mechanic, M.B., & Resick, P.A. (1997, November). *Childhood sexual and physical abuse as predictors of adult sexual and physical revictimization in a sample of female crime victims*. In M. Cloitre (Chair) Sexual revictimization of women: risk factors and



prevention strategies. Symposium presented at the 31st. Annual Convention of the Advancement of Behavior Therapy, Miami, Fla.

Astin, M.C., Resick, P.A. & Mechanic, M.B. *Battered women: An information processing model of predicting PTSD and depression* (1997, November). Paper presented at the 13th Annual Meeting of International Society of Traumatic Stress Studies, Montreal, Canada.

Mechanic, M.B., Maguire, M., Resick, P.A., & Griffin, M.G. (1996, November). *Rape trauma narratives: Coherence and recovery from trauma*. In S. Orsillo (Chair). Narrative accounts of traumatic experience, Symposium presented at the 30th Annual Convention of the Association for the Advancement of Behavior Therapy, New York, New York.

Mechanic, M.B., Resick, P.A., & Griffin, M.G. (1996, November). *Traumatic memory in recent victims of sexual assault*. In R.J. McNally (Chair). Memory in survivors of sexual violence. Symposium presented at the 30th Annual Convention of the Association for the Advancement of Behavior Therapy, New York, New York.

Mechanic, M.B., Griffin, M.G. & Resick, P.A. (1995, November). *Traumatic stress reactions following disaster: The mediating impact of marital conflict, marital satisfaction and coping*. In D.S. Riggs (Chair) The impact of relationship factors on post-traumatic stress responses. Symposium presented at the 29th Annual Convention of the Association for the Advancement of Behavior Therapy, Washington, D.C.

Mechanic, M.B., Griffin, M.G., & Resick, P.A. (1995, November). *Narrative accounts of rape Assessing naturalistic changes as evidence of information processing*. Paper presented at the 29th Annual Convention of the Association for the Advancement of Behavior Therapy, Washington, D.C.

Mechanic, M.B., Resick, P.A., & Griffin, M.G. (1995, November). *Narrative accounts of rape: Is there evidence of information processing?* Paper presented at the 11th Annual Meeting of the International Society for Traumatic Stress Studies, Boston, MA.

Nishith, P., Mechanic, M.B., Griffin, M.G., & Resick, P.A. (November, 1995). *Peritraumatic dissociation and chronic PTSD in rape victims*. Paper presented at the 11th Annual Meeting of the International Society for Traumatic Stress Studies, Boston, MA.

Resick, P.A., Griffin, M.G., Mechanic, M.B. & Trusty, M.L. (1995, November). *Marital abuse in the wake of disaster: Testing a model*. Paper presented at the 29th Annual Convention of the Association for the Advancement of Behavior Therapy, Washington, D.C.

Mechanic, M.B. (1995, June). *Battered Woman Syndrome: The impact of expert testimony on juror decision making*. Paper presented at the Annual Meeting of the Law and Society Association, Toronto, Canada.

Mechanic, M.B., Resick, P.A., & Griffin, M.G. (1994, November). *The role of cognitive*

- schemata in persistent PTSD following sexual assault.* In M.B. Mechanic and D.S. Riggs (Co-Chairs) Cognitive schemata in female victims of sexual assault. Symposium presented at the 28th Annual Convention of the Association for the Advancement of Behavior Therapy, San Diego, CA.
- Mechanic, M.B., Resick, P.A., & Griffin, M.G. (1994, November). *Post-rape reactions: Does knowing the rapist make a difference?* In M.B. Mechanic and D.S. Riggs (Co-Chairs) PTSD: a search for subtypes. Symposium presented at the 28th Annual Convention of the Association for the Advancement of Behavior Therapy, San Diego, CA.
- Mechanic, M.B., Resick, P.A., & Griffin, M.G. (1994, November). *Acute stress disorder following sexual assault: A first glance.* In D.E. Hearst-Ikeda and M.B. Mechanic (Co-Chairs) Dissociation and trauma. Symposium presented at the 10th Annual Meeting of the International Society for Traumatic Stress Studies, Chicago, IL.
- Mechanic, M.B., Resick, P.A., & Griffin, M.G. (1994, November). *Cognitive schemata and coping strategies in persistent PTSD following sexual assault.* In M.B. Mechanic and D.S. Riggs (Co Chairs) Cognitive schemata in post-traumatic stress disorder. Symposium the 10th Annual Meeting of the International Society for Traumatic Stress Studies, Chicago, IL.
- Griffin, M.G., Resick, P.A., & Mechanic, M.B. (1994, November). *Are there subtypes of PTSD?: Physiological and non-verbal evidence.* In M.B. Mechanic and D.S. Riggs (Co-Chairs) PTSD: a search for subtypes. Symposium presented at the 28th Annual Convention of the Association for the Advancement of Behavior Therapy, San Diego, CA.
- Griffin, M.G., Resick, P.A., Mechanic, M.B (1994, November). *Psychophysiological and nonverbal assessment of peritraumatic dissociation in rape victims.* In M.G. Griffin (Chair) Objective indicators of dissociation in Post-Traumatic Stress Disorder. Symposium presented at the 10th Annual Meeting of the International Society for Traumatic Stress Studies, Chicago, IL.
- Resick, P.A., Mechanic, M.B., Griffin, M.G., & Spengel, L (1994, November). Marital adjustment and violence in the wake of the great flood of 1993. In. P.A. Resick (Chair) *Coping with disaster: Symptoms and interpersonal effects.* Symposium presented at the 10th Annual Meeting of the International Society for Traumatic Stress Studies, Chicago, IL.
- Mechanic, M.B., & Resick, P.A. (1994, July). *An approach to treating post-traumatic stress disorder and depression.* In J.D. Maser (Chair), Research based treatments. Symposium presented at the 20th Annual Meeting of the National Association for Rural Mental Health, Des Moines, IA.
- Mechanic, M.B. & Resick, P.A. (1994, June). *Participation in the legal process following sexual*

*assault: Implications for recovery.* In K.A. Fischer (Chair), Gender, voice, and legal consciousness. Symposium presented at the Annual Meeting of the Law and Society Association, Phoenix, AZ.

Mechanic, M.B. & Resick, P.A. (1993, October). *The personal beliefs and reactions scale: Assessing rape-related cognitive schemata.* In P.A. Resick (Chair), The role of cognition in PTSD. Symposium conducted at the 9th Annual Meeting of the International Society for Traumatic Stress Studies, San Antonio, TX.

Mechanic, M.B., Resick, P.A., Schnicke, M.K., & Griffin, M.G. (1993, November). *The impact of guilt and self-blame on recovery from PTSD in rape victims.* In E.S. Kubany (Chair), Assessment and treatment of trauma related guilt. Symposium conducted at the 27th Annual Convention of the Association for the Advancement of Behavior Therapy, Atlanta, GA.

Mechanic, M.B., Resick, P.A., & Griffin, M.G. (1993, November). *Rape-related PTSD: Comorbidity of DSM-III-R Axis I disorders and associated symptoms.* In D.E. Hearst (Chair), Collateral symptoms in women with PTSD: Depression, physical health, sexual, and interpersonal adjustment. Symposium conducted at the 27th Annual Convention of the Association for the Advancement of Behavior Therapy, Atlanta, GA.

Mechanic, M.B. & Aber, M. (1992, March) *Battered woman syndrome: Development of a measure to assess juror common knowledge.* Poster presented at the Biennial Meeting of the American Psychology Law Society (APLS), San Diego, California.

Hoge, S.K., Oberlander, L., Mechanic, M.B., & Monahan, J. (1992, August). *Coercion in the hospitalization process: Clinical variables and perceptions of coercion.* Paper presented at the 10th Annual Meeting of the American Psychological Association, Washington, D.C.

Mechanic, M.B., Miller, G.M., & Klein, D.N. (1986, August). *Assessment and differentiation of chronic depression in a non-patient sample.* Paper presented at the 94th Annual Meeting of the American Psychological Association, Washington, D.C.

Mechanic, M.B., & Abramson, P.R. (1981). *Sexuality and the media: Three decades of best selling novels and top rated films from 1959-1979.* Paper presented at the Western Psychology Conference for Undergraduate Research, Santa Clara, California.

### **Invited Professional Presentations and Workshops**

Mechanic, M.B. (January, 2019). *Intimate Partner Violence and Sexual Assault: Understanding victim responses.* Training presented for the Marines Special Victim Legal Counsel Training.

Mechanic, M.B. (December, 2018). *Sexual assault: Understanding the complexities of victim*

*behaviors and reactions*. Training presented for the Los Angeles County District Attorney's Association, Los Angeles, CA.

Mechanic, M.B. (September, 2018). *Sexual assault: Understanding the complexities of victim behaviors and reactions*. Presentation to the California Medical Board Sexual Assault Investigators. Diamond Bar, CA.

Mechanic, M.B. (October, 2018). *Sexual assault: Understanding the complexities of victim behaviors and reactions*. Presentation to the California Medical Board Sexual Assault Investigators. Sacramento, CA.

Mechanic, M.B. (January, 2018). *Sexual assault: Understanding the complexities of victim behaviors and reactions*. Presentation to the U.S. Military 9<sup>th</sup> Special Victim Counsel Certification Course. Charlottesville, VA.

Mechanic, M.B. (January, 2018). *Promoting resilience when working with sexual trauma survivors*. Presentation to U.S. Military 9<sup>th</sup> Special Victim Counsel Certification Course. Charlottesville, VA.

Mechanic, M.B. (February, 2017). *Trauma-informed legal advocacy: Fostering resilience when working with victims*. Presentation to U.S Marine Corps Special Legal Counsel Training. Camp Pendelton, CA.

Mechanic, M.B. (February, 2017). *Risk assessment for Attorneys: Assessing harm to self and others for special victims legal counsel*. Presentation to Marine Corps Special Legal Counsel Training. Camp Pendelton, CA.

Mechanic, M.B. (2016, August). *Sexual assault victim dynamics*. Presentation to the Washington and Multanomah County, OR Prosecutor, Law Enforcement, and Victim Advocate Training. Hillsboro, OR.

Mechanic, M.B. (2016, August). *Fostering resilience and avoiding vicarious trauma when working with victims*. Presentation to the Washington and Multanomah Counties Prosecutor, Law Enforcement, and Victim Advocate Training. Hillsboro, OR.

Mechanic, M.B. (2016, August). *Sexual assault victim dynamics*. Presentation to U.S. Military 7<sup>th</sup> Special Victim Counsel Certification Course. Charlottesville, VA.

Mechanic, M.B. (2016, August). *Trauma-informed legal advocacy: Fostering resilience when working with victims*. Presentation to U.S. Military 7<sup>th</sup> Special Victim Counsel Certification Course. Charlottesville, VA.

Mechanic, M.B. (2016, July). *Sexual assault cases: Counterintuitive victim behavior, offender dynamic, and effective communication with victims*. Plenary address for the U.S. Army Special Victim Prosecutor Training. Ft. Belvoir, VA.

- Mechanic, M.B. (2016, July). *Trauma informed legal advocacy and promoting personal resilience among special victim prosecutors*. Presentation for the U.S. Army Special Victim Prosecutor Training. Ft. Belvoir, VA.
- Mechanic, M.B. (2016, January). *Sexual assault victim and offender behavior*. U.S. Military 6<sup>th</sup> Special Victim Counsel Certification Course. Charlottesville, VA.
- Mechanic, M.B. (2016, January). *Trauma-informed legal advocacy: Fostering resilience when working with victims*. U.S. Military 6<sup>th</sup> Special Victim Counsel Certification Course. Charlottesville, VA.
- Mechanic, M.B. (2015, September). *Counterintuitive Victim Behavior: Use of expert testimony in sexual assault prosecution*. Presentation for the Sex Crimes Division, LA County District Attorney's Office Sex Crimes Division.
- Mechanic, M.B. (2015, July). *Counterintuitive Victim Behavior: Use of expert testimony in sexual assault prosecution*. Continuing Legal Education (CLE) program for the Ventura County District Attorney's Office.
- Mechanic, M.B. (2014, June). *Counterintuitive Victim Behavior Testimony in Rape and Sexual Assault Cases*. Invited presentation for the Los Angeles County District Attorney's Office Training Division.
- Mechanic, M.B. (2013, December). *Use of expert testimony to explain counterintuitive victim behaviors in sexual assault cases*. Invited presentation for the Los Angeles County Sex
- Mechanic, M.B. (2013, September). *Intimate Partner Battering and its Effects in Cases of Battered Women Charged with Crimes*. Invited presentation for the San Bernardino Public Defender's Office.
- Mechanic, M.B. (February, 2012). *Battered woman syndrome meets intimate partner battering and its effects: When social science concepts outpace legal Rubric*. Invited presentation for St. Louis University Law School Symposium on Battered Women Who Kill.
- Mechanic, M.B. (2011, April). *Forensic Psychology: What is it?* Presentation to CSUF student members of the American Psychology-Law Society.
- Mechanic, M.B. (2008, November). *Intimate Partner Violence and Battered Women Charged with Crimes*. Los Angeles County Bar Association Continuing Legal Education Seminar.
- Mechanic, M.B. (2008 July). *Children Exposed to Domestic Violence*. Invited presentation for the Alameda County Courts, Domestic Violence and Juvenile Court Training, Oakland, CA.

- Mechanic, M.B. (2007, October). *Child maltreatment and trauma: Considerations for capital defense work*. Paper presented at the Los Angeles County Public Defender Capital Defense Conference, Los Angeles, CA.
- Mechanic, M.B. (2007, February). *The challenges and advantages of collaborative research*. Paper presented at Research: Making science come to life in the hands of advocates. University of Kentucky, Center for Research on Violence Against Women.
- Mechanic, M.B. (2006, February). *Stalking and violence against women*. Paper presented for the Arizona Chapter of the Association of Family and Conciliation Courts, Sedona Arizona.
- Mechanic, M.B. (2005, May). *Intimate partner violence, stalking, and PTSD*. Paper presented at the VA Maryland Healthcare System conference on Women and PTSD, Baltimore, MD.
- Beck, C. J. A., Walsh, M., Taylor, C., & Mechanic, M. (2004, October). *Domestic Violence in Couples Mandated to Attend Divorce Mediation*. Presented at the Udall Center for Policy Studies, Tucson, AZ.
- Mechanic, M.B. (April, 2004). *Researcher-Practitioner Collaboration to Improve Research on Violence Against Women.: Findings from the NVAWPRC focus groups*. University of Kentucky, Violence Against Women Research Center.
- Mechanic, M.B. (March, 2004). *Expert testimony on the effects of battering*. Invited presentation for the Missouri Coalition Against Domestic Violence Conference on Expert Testimony. St. Louis, Missouri.
- Mechanic, M.B. (November, 2003). *Anxiety Disorders and Women*. Anxiety Disorders of Association of America. Chantilly, Virginia.
- Mechanic, M.B. (October, 2003). *Mental Health Consequences of Violence Against Women*. Toward a national research agenda on violence against women: A national research conference. University of Kentucky Center for Research on Violence Against Women, Lexington, KY.
- Mechanic, M.B. (2003, April). *Expert testimony on the effects of battering*. Invited presentation for the Missouri Coalition Against Domestic Violence Conference on Expert Testimony. St. Louis, Missouri.
- Mechanic, M.B. (2002, March). *Nature and dynamics of domestic violence: Relevance for the practice of law*. Workshop presented for the Missouri Bar Association. Lake of the Ozarks, MO.
- O'Brien, S., & Mechanic, M.B. (2002, March). *Defending battered women charged with crimes*. Workshop presented for the Missouri Bar Association. Lake of the Ozarks, MO.



Mechanic, M.B. (2002,March). *Child maltreatment and intimate partner violence*. Invited address presented for the Jefferson County, Missouri Family Court Conference.

Mechanic, M.B. (2001, December). Expert witness commentator in: *The relevance of domestic violence in the courtroom: Expert testimony in a duress case-Mock Trial*. Co-sponsored by the American Bar Association Commission on Domestic Violence and Criminal Justice Section and the International Society for Traumatic Stress Studies. New Orleans, LA.

Mechanic, M.B. (2001,May). *The intersection of stalking and intimate partner abuse*. The first research conference on stalking. Rutgers University, New Brunswick, NJ.

Mechanic, M.B. (2001, January). *Expert witness testimony: Consideration of domestic violence in child custody determinations*. Legal services training sponsored by the Missouri Coalition Against Domestic Violence.

Mechanic, M.B. (2001, January). *Domestic violence and Child maltreatment: Legal and Psychological Intersection*. Presentation for the St. Louis Family Court Guardian Ad Litem Training.

Mechanic, M.B. (2000, October). *Preliminary findings from an NIMH study of 350 Battered Women*. Colloquium presented at the Center for Trauma Recovery, University of Missouri-St. Louis.

Mechanic, M.B. (2000,May). *The intersection between child maltreatment and domestic violence*. Presentation for the Annual Jefferson County Family Violence Council Training.

Mechanic, M.B. (2000,May). *Working effectively with expert witnesses in domestic violence cases*. Workshop presented at the Illinois Coalition Against Domestic Violence Annual Legal Conference.

Mechanic, M.B. (2000,April ). *Secondary trauma associated with representing battered women*. Workshop presented at Legal Services of Eastern Missouri.

Mechanic, M.B., & Weaver, T.W. (2000,January). *Domestic violence: The relationship to child abuse and neglect*. Presentation for the 22nd Judicial Circuit (City of St. Louis) Court Improvement Project.

Mechanic, M.B. (1999,January). *Vicarious traumatization: Impact of trauma work on trauma workers: Part 2*. Workshop presented for the staff at the Kathy J. Weinman Shelter for Battered Women, St.. Louis, MO.

Mechanic, M.B. (1998,December). *Vicarious traumatization: Impact of trauma work on trauma*

*workers: Part I.* Workshop presented for the staff at the Kathy J. Weinman Shelter for Battered Women, St. Louis, MO.

Mechanic, M.B. (1998, October). *Spousal abuse and workplace violence*. Invited presentation for the mid-year educational conference of the American College of Legal Medicine. St. Louis, MO.

Mechanic, M.B. (1997, November). *Acquaintance rape: Developing awareness and decreasing risk*. Invited presentation for COPS series sponsored by the University of Missouri Police Department.

Mechanic, M.B. (1997, November). *Criminal forensic assessment*. Colloquium presented for the University of Missouri-St. Louis Clerkship Seminar Series.

Mechanic, M.B. (1997, November). *Forensic psychological assessment: On being a psychological skeptic*. Colloquium presented at the University of Missouri-St. Louis, Department of Psychology Colloquium Series.

Mechanic, M.B. (1997, November). *Psychological sequelae of traumatic events: Part I. Overview and conceptual frameworks*. Invited workshop presented for Provident Counseling Center.

Mechanic, M.B. (1997 November). *Psychological sequelae of traumatic events: Part II. Using structured diagnostic interviews to assess trauma history and posttraumatic symptoms*. Invited Workshop presented for Provident Counseling Center.

Mechanic, M.B. (1997, November). *Sexual trauma: Conceptualization and intervention strategies*. Invited workshop at the University of Missouri-St. Louis Counseling Services Center.

Mechanic, M.B. (1997, May). *Sexual trauma and posttraumatic stress disorder*. Invited workshop presented for the Family Court of St. Louis County.

Mechanic, M.B., & Weaver, T.L. (1997, April ). *Battered women: Sequelae of trauma*. Continuing Medical Education Workshop, St. Joseph's Medical Center.

Mechanic, M.B. (1997, February). *Violence, trauma and PTSD*. Invited workshop for the Mental Health Association of Greater St. Louis.

Mechanic, M.B. (1997, January). *Memory for sexual trauma*. Invited presentation for the ProWomen Therapists Group.

Mechanic, M.B. (1996, April). *Women and trauma*: Invited presentation for the ProWomen Therapists Group.

Mechanic, M.B. (1994, March). *Rape: Fact vs. Fiction*. Presentation for the University of



Missouri Noon Cultural Series.

Mechanic, M.B. (1994, April). *Date Rape: Myths and Realities*. Presentation for the University of Missouri Women's Center.

Cornell, D., Hawk, G.L. & Mechanic, M.B. (1992, February). *Family homicide: Forensic assessment issues*. Paper presented at the Advanced Forensic Evaluation Training Program, Institute of Law, Psychiatry and Public Policy, University of Virginia.

Mechanic, M.B., Hawk, G., & Lombardo, P.A. (1991, May). *Battered woman syndrome*. Workshop presented at the 20th Semi-Annual Forensic Symposium, University of Virginia, Charlottesville.

Mechanic, M.B. (1990, February). Battered women and the criminal law. Paper presented at the Advanced Forensic Training Program, Institute of Law, Psychiatry & Public Policy, University of Virginia.

### **Awards**

Nominated for Best Paper of 2008, in the Journal, Violence Against Women

### **Selected Teaching Experience**

Fall, 2011	<u>California State University, Fullerton, Instructor</u> Psychology 331: <b>Psychology of Personality (ONLINE)</b> Psychology 341: <b>Abnormal Psychology</b> Psychology 501: <b>Legal, Ethical and Professional Issues in Clinical</b> (Graduate Level Course)
Spring, 2010	<u>California State University, Fullerton, Instructor</u> Psychology 561: <b>Psychological Assessment</b> (Graduate Level Course) Psychology 331: <b>Psychology of Personality (ONLINE)</b>
Fall, 2009	<u>California State University, Fullerton, Instructor</u> Psychology 331: <b>Psychology of Personality (ONLINE)</b> Psychology 341: <b>Abnormal Psychology</b> Psychology 501: <b>Legal, Ethical and Professional Issues in Clinical</b> (Graduate Level Course)
Spring, 2008	<u>California State University, Fullerton, Instructor</u> Psychology 561: <b>Psychological Assessment</b> (Graduate Level Course) Psychology 520T: <b>Trauma, Violence, &amp; Victimization</b> (Graduate Level Course) Psychology 341: <b>Abnormal Psychology</b>
Fall, 2007	<u>California State University, Fullerton, Instructor</u>

	Psychology 331: <b>Psychology of Personality</b> Psychology 501: <b>Legal, Ethical and Professional Issues in Clinical</b> (Graduate Level Course)
Fall, 2007	<u>Florida International University, Adjunct Instructor</u> Psychology of Personality (ONLINE COURSE)
Summer, 2007	<u>Florida International University, Adjunct Instructor</u> Psychology of Personality (ONLINE COURSE) Abnormal Psychology (ONLINE COURSE)
Spring, 2007	<u>California State University, Fullerton, Instructor</u> Psychology 561: <b>Psychological Assessment</b> (Graduate Level Course) Psychology 341: <b>Abnormal Psychology</b>  <u>Florida International University, Adjunct Instructor</u> Psychology of Personality (ONLINE COURSE)
Fall, 2006	<u>California State University, Fullerton, Instructor</u> Psychology 331: <b>Psychology of Personality</b> Psychology 501: <b>Legal, Ethical and Professional Issues in Clinical</b> (Graduate Level Course)
Spring, 2006	<u>California State University, Fullerton, Instructor</u> Psychology 331: <b>Psychology of Personality</b> Psychology 561: <b>Psychological Assessment</b> (Graduate Level Course)
Fall, 2005	<u>California State University, Fullerton, Instructor</u> Psychology 331: <b>Psychology of Personality</b> Psychology 501: <b>Legal, Ethical and Professional Issues in Clinical</b> (Graduate Level Course) Psychology 520T: <b>Trauma, Violence, &amp; Victimization</b> (Graduate Level Course)
Spring, 2005	<u>California State University, Fullerton, Instructor</u> Psychology 331: <b>Psychology of Personality</b> Psychology 561: <b>Psychological Assessment</b> (Graduate Level Course)
Fall, 2004	<u>California State University, Fullerton, Instructor</u> Psychology 501: <b>Legal, Ethical and Professional Issues in Clinical</b> (Graduate Level Course) Psychology 331: <b>Psychology of Personality</b>

Spring, 2004	<u>California State University, Fullerton, Instructor</u> Psychology 331: <b>Psychology of Personality</b> Psychology 561: <b>Psychological Assessment</b> (Graduate Level Course)
Fall, 2003	<u>California State University, Fullerton, Instructor</u> Psychology 331: <b>Psychology of Personality</b> Psychology 501: <b>Legal, Ethical and Professional Issues in Clinical</b> (Graduate Level Course)
Spring, 2003	<u>California State University, Fullerton, Instructor</u> Psychology 331: <b>Psychology of Personality</b> Psychology 561: <b>Psychological Assessment</b> (Graduate Level Course)
Fall, 2002	<u>California State University, Fullerton, Instructor</u> Psychology 331: <b>Psychology of Personality</b> Psychology 501: <b>Legal, Ethical and Professional Issues in Clinical</b> (Graduate Level Course)
Winter, 1999	<u>University of Missouri-St. Louis, Instructor</u> Psychology 292: <b>Psychology of Victimization</b>
Fall, 1997	<u>University of Missouri-St. Louis, Instructor</u> Psychology 410: <b>Women and Mental Health</b> (Graduate Level Course)
Spring, 1995	<u>Southwest Missouri State University, Instructor</u> Office of Continuing Education Victimology Basic Certification Program Course: <b>Sexual Assault and the Rapist</b>
Winter, 1995	<u>University Of Missouri-St. Louis, Instructor</u> Psychology 292: <b>Psychology of Victimization</b>
Fall, 1993	<u>University of Missouri-St. Louis, Instructor</u> Psychology 392: Special topics in Psychology: <b>Psychology and the Legal System.</b>
Spring, 1988	<u>University of Illinois, Instructor</u> (graduate and undergraduate course) Psychology 368: <b>Psychology and the law:</b> Exploring the application of psychological knowledge to the study of psycholegal issues
Fall, 1987	<u>University of Illinois, Instructor</u> Psychology 368: <b>Psychology and the law:</b> Exploring the application of psychological knowledge to the study of psycholegal issues.

Spring, 1986      University of Illinois, Co-Instructor  
 Psychology 368: **Psychology and the law**: Exploring the application of psychological knowledge to the study of psycholegal issues.

**Clinical Experience and Supervision of Clinical Training**

1998-2002      **Clinical Supervisor**, Community Psychological Services Center, University of Missouri-St. Louis

--Supervise psychology graduate students conducting psychological evaluations and individual therapy.

1992-2002      **Clinical Staff Member**, Center for Trauma Recovery, University of Missouri-St. Louis.

--Provided individual and group therapy for rape survivors using cognitive processing approach. Perform clinical assessments of physical and sexual assault survivors. Conduct crisis debriefing sessions in the community following traumatic, violent events, such as airline crashes and bank robberies. Supervise graduate students and post-doctoral fellows who provide individual and group therapy (since 1998).

1996-1997      **Post-Doctoral Fellow**, Center for Trauma Recovery and Community Psychological Services Center, University of Missouri-St. Louis.

--Supervised Post-Doctoral Clinical Training Program. Included individual and couples therapy, clinical and forensic assessment with trauma and non-trauma populations. Conducted assessments for the determination of disability.

1988-1990      **Correctional Center Clinician**, Champaign County Correctional Center (on contract with the Mental Health Center of Champaign County, Illinois).

--Provided evaluation, assessment, crisis intervention and brief psychotherapy to male and female jail residents. Co-facilitated a bi-weekly support group for female residents. Participated in training jail staff in mental health issues.

1982-1988      **Clinical Psychology Intern**, Psychological Services Center, University of Illinois.

Practica:      Adult Individual Psychotherapy  
                  Forensic Evaluation  
                  Family and Marital Therapy  
                  Advanced Adult Individual Psychotherapy

1979-1980      **Rape Crisis Counselor**, Cedars-Sinai Medical Center, Los Angeles, California.

**Selected Professional Activities**

2015-current	Advisory Board, Family Violence Appellate Project
2014-current	Advisory Board Mind-Experts International
2012	Consultant, Office of Victims of Crime Technical and Training Assistance (OVC-TTA)
2012 (Feb.)	Grant Reviewer, United States Department of Defense (DOD), Congressionally Directed Medical Research Programs on PTSD.
2009	Nominated <b>Distinguished Reviewer</b> , <i>Psychology of Women Quarterly</i> .
2008 (Feb.)	American Psychological Association Legislative Advocacy Training. Selected to serve as Division 41 (psychology and law) representative. Will brief local congressional representative on violence against women issues.
2007 (Dec.)	Grant Reviewer, United States Department of Defense (DOD), Congressionally Directed Medical Research Programs on PTSD.
2002-2007	<b>Editorial Board</b> , Journal of Traumatic Stress
2003-2007	<b>Associate Editor</b> , Domestic Violence Reports.
July, 2004	<b>Consultant</b> to the Bureau of Justice Statistics on the development of a supplement to the National Crime Victimization Survey
2004-2006	<b>Public Education Committee</b> , International Society for Traumatic Stress Studies
2003-2006	<b>Editorial Board</b> , <i>Psychology of Women Quarterly</i> .
2003-2006	<b>Editorial Board</b> , Journal of Aggression, Maltreatment and Trauma.
Fall, 2002-current	Advisory Board, Women's Center: California State University, Fullerton
2000-2003	Board of Directors, Aid for Victims of Crime, St. Louis, Missouri
May-October 1999	Member of Missouri Governor Carnahan's Task Force for the Development of a Model School Crisis Response Plan.
April, 1999	Completed National Organization for Victim Assistance (NOVA) Advanced Training for Community Crisis Response
February 18-19, 1996	Participated in SCID training for the DSM-IV with Lynn Gladdis, Ph.D., trainer.

1995-1999	Conducted victim advocate training three times per year for the St. Louis City Prosecutor's Victim Advocate Program
1995-1997	Volunteer, St. Louis Anti-Violence Project. --Conducted volunteer and community education training, fundraising, and served as media spokesperson.
June, 1995	Invited Chair/Discussant for a panel at Law and Society Association Meeting, Toronto.
September 9, 1994	Completed the Sex Offender Evaluation Training Program, Institute of Law, Psychiatry and Public Policy, University of Virginia.
July, 1994 Program	Member of the Planning Committee for the Victimology Certification Basic Training Program Southwestern Missouri State University
June 14-15, 1994	Participated in the Law and Society Association's Graduate Student Workshop on the theme of "Representation." [Participants are selected by application]
July 13-17, 1994	Participated in the Law and Society Association's Summer Institute. Theme: "Every Day Practice and Trouble Cases." [Participants selected by application]
1993-1998	Coordinator, Center for Trauma Recovery Colloquium Series.
1993-1995	Member of Community-Based Jail Planning Task Force
February 22-24, 1993	Completed National Organization of Victim Assistance (NOVA) Community Crisis Response Team (CRT) Training Institute. Active Member of St. Louis CRT.
September-Oct, 1990	Completed the 54-hour clinical hypnosis training course conducted by the Virginia Hypnosis Society.
August, 1990	Completed the 48-hour Forensic Training Course at the Institute for Law, Psychiatry & Public Policy, University of Virginia.
1983-1985	Graduate Student Representative, Department of Psychology, University of Illinois
<b><u>Memberships:</u></b>	American Psychological Association International Society for Traumatic Stress Studies (ISTSS) American Psychological Association (Division 56 Trauma Psychology)

American Psychology Law Society (Division 41, APA)  
The Psychology of Women (Division 35, APA)  
Division of Media Psychology (APA)  
APSAC (American Professional Society of Child Abuse)  
Association of Threat Assessment Professionals  
Los Angeles County Psychological Association

### **Ad Hoc Reviewer**

**Journals:** Psychological Bulletin  
Trauma, Violence, and Aggression  
Law and Human Behavior  
Journal of Interpersonal Violence  
International Journal of Forensic Mental Health  
Justice Quarterly  
Psychological Assessment  
Violence & Victims  
Journal of Abnormal Psychology  
Journal of Consulting and Clinical Psychology  
Violence Against Women: An Interdisciplinary Journal  
Journal of Aggression, Maltreatment and Trauma

**Grants:** United States Department of Defense, Congressionally Directed Medical  
Research Grants, PTSD and Trauma.  
City University of New York Intramural Research Grants  
United States Government, Department of Justice/OJP, Violence Against  
Women Office.  
United States Government, Department of Veterans Affairs, Merit Review  
Grants.  
The Ontario Mental Health Foundation  
Research Board, University of Missouri-St. Louis.

**Conferences:** Program Specialty Chair: American Psychology Law Society, 2007.  
Reviewer, American Psychological Association Conference, Division of  
Psychology and Law, 2008.  
Program Specialty Chair: American Psychology Law Society, 2007.  
Reviewer, Program Committee: American Psychology Law Society, 2005  
Program Specialty Chair: American Psychology Law Society, 2005.  
Reviewer, Program Committee: American Psychology Law Society, 2005.  
Reviewer, Program Committee: Association for the Advancement of  
Behavior Therapy, 1997.



Reviewer, Program Committee: American Psychology Law Society (APLS-Division 41) 1995 , 2002 Biennial Conferences.  
 Reviewer, Program Committee: American Psychology Law Society (APLS-Division 41) Program for at the 2003 APA.  
 Reviewer, Program Committee: American Psychology Law Society (APLS-Division 41) 2004 Biennial Conference Program.

**Professional Standards:**

National Victim Assistance Standards Consortium, invited reviewer for the development of professional standards of practice (2000).

Media Interviews

February, 1996	TV 30 (St. Louis) : Men who kill intimate female partners
March, 1996	St. Louis Post-Dispatch: Acquaintance rape
May, 1996	St. Louis Post-Dispatch: Domestic violence
July, 1996	St. Louis Post-Dispatch: Floods/domestic abuse
July, 1996	TV30 (St. Louis): 1993 Floods and domestic abuse
July, 1996	Radio News Service: domestic abuse/1993 Floods
July, 1996	TV 5 (St. Louis): Rohypnol and Date Rape
September, 1996	KWMU radio (St. Louis): Violence against women
November, 1996	TV 4 (St. Louis): Date rape drugs
December, 1996	Alpha Phi Quarterly: Date Rape
March, 1997	Riverfront Times (St. Louis): Domestic violence
September, 1997	TV 4 (St. Louis): Acquaintance Rape
February, 1998	Radio Interview-Metro News Wire Service: Domestic violence
February, 1998	Radio Interview-KWMU St. Louis on the Air: Domestic violence
March, 1998	Radio Interview-WILL: Domestic violence and child abuse
March, 1998	Radio Interview- KMOX: Domestic violence
March, 1998	Radio Interview-Newsbytes wire service: Domestic violence
April, 1998	Radio Interview-Missouri Net news wire service.
June, 1998	TV4 (St. Louis): Legislative Changes in Rape laws
July, 1998	TV 11 (St. Louis): Recovery from rape
October, 1998	TV 5 (St. Louis): Intimate Partner violence
October 1998	Newsbytes wire service (radio): Intimate partner violence.
October, 1998	TCI Cable TV: Intimate partner violence
October, 1998	UMSL Current: Intimate partner violence
February, 1999	TV 4: Stalking and domestic violence
February, 1999	Radio Interview-WILL: Stalking and domestic violence
February, 1999	Radio Interview-Missouri Net news wire service: Stalking and domestic violence
February, 1999	Radio Interview-Newsbytes wire service: Domestic violence and stalking
March, 1999	Radio Interview- KMOX: Rape and recovery
March, 1999	San Jose Star: Domestic violence
March, 1999	Newsbytes wire service (radio): Domestic violence
April, 1999	NYU-Date rape
April, 1999	Newsbytes wire service (radio): Littleton, CO School shooting



April, 1999	Radio Interview--KTRS : Littleton, CO School shooting
April, 1999	TV 2: Media and School violence
April, 1999	TV 30: Littleton, CO School shooting
April, 1999	KMOX : Littleton, CO School shooting/crime victims
April, 1999	TV 4 Eye on St. Louis: School violence/Crime Victim Rights
April, 1999	TV 5: School violence October, 1999
	Salon Magazine: Familial homicide
January, 2000	KMOX Radio: Rape
January, 2000	St. Louis Post-Dispatch: Relationship harmony & blood pressure
February, 2000	GHB: Date rape drug
February, 2000	AP Wire Service-Why men rape.
July, 2000	Mademoiselle Magazine: Dating violence
January, 2001	WILL Radio: Missouri Domestic Violence Legislation
April, 2001	Court TV: Stalking
July, 2001	St. Louis Post-Dispatch: Domestic homicide
July, 2001	St. Louis Post-Dispatch: Domestic violence and family murders.
September, 2001	NBC, North Carolina Affiliate: Domestic violence, stalking, and homicide.
September, 2001	KWMU Radio: Same-sex partner abuse.
September 2001	FOX 2 news: Impact of WTC tragedy.
September 2002	Chronicle of Higher Education: Human Research Participants and IRB's.
November, 2002	Independent Journalist: Ethical Issues in the Provision of Mandated Treatment of Offenders
October, 2005	CSUF Communication Studies Cable Access Show: Hurricane Katrina Effects
October, 2005	Pittsburgh Tribune Review: Stalking
June, 2006	Health Behavior News Service: Stalking
June, 2006	ABC News Radio, New York: Stalking
June, 2006	Associated Press: Celebrity Stalking
July, 2006	Stalking in the Bob Uecker case: LA Times/Lubbock Avalanche Journal
February, 2006	Daily Titan: School Violence
February, 2007	USA Today: Relationship Stalking
February, 2008	Family Homicide: KDOC TV
February, 2008	Family Homicide: Daily Titan
February 2007	USA Today: Stalking in the female astronaut case
November, 2009	Fort Hood Shootings, CNN
August, 2012	CNN Reporter Interview- Korean music fans and the "saesang" mind.
March, 2013	Orange County Register – Community Perceptions of Risk and Safety
November, 2015	Good Housekeeping Magazine – Emotionally Abusive Relationships
January, 2016	MTV News-Traumatic Impact of Violent Media Exposure
January, 2016	San Diego Reader, Battered Women Charged with Crimes
February, 2016	Washington Post, Stalking and Partner Homicide
October, 2016	Fox News Health.com: Sexual Assault: What Hinders Reporting?
February, 2017	Daily Titan: Sexual Assault
April, 2017	Daily Titan: Suicide and College students
June, 2017	Vice: Stalking and Gun Violence

October, 2017	Yahoo News: Sexual assault and harassment –Why victims come forward in cases of offenders with power and status.
October, 2017	Arizona State University, The State Press, Dating and Sexual Violence Among College Women
March, 2018	Secondary Traumatic Stress and Media Coverage of Mass Violence, The Trace
April, 2018	Therapies for Sexual Trauma, Good Morning America (digital edition)
November, 2018	PTSD and Violence, Los Angeles Times.
November, 2018	Emotional and Psychological Abuse in Relationships, Prevention.com
December, 2018	Sexual Assault, Daily Titan

### **Academic Honors and Awards**

Violence Against Women (journal) nominated, Best Research Paper of the year (2008)  
 American Association of Trial Consultants Paper Competition Award (2000)  
 American Psychology Law Society Dissertation Award (1996)  
 American Psychology Law Society (APLS-Division 41)  
 (Grant-In-Aid to support dissertation)  
 Society for the Psychological Study of Social Issues (SPSSI)  
 (Grant-In-Aid to support dissertation)  
 Graduate College Dissertation Fellowship, University of Illinois  
 Department of Psychology Dissertation Grant, University of Illinois  
 Graduate College Thesis Grant, University of Illinois  
 Graduate College Travel Grant, University of Illinois  
 National Institute of Mental Health Clinical Traineeship  
 President's Undergraduate Fellowship  
 B.A., Magna Cum Laude  
 Psychology honor's program/award of honor's on undergraduate thesis  
 Pi Gamma Mu, social science honor society

# EXHIBIT 2



*United States Attorney  
Northern District of California*

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March 24, 2020

Kevin Downey  
Lance Wade  
Williams & Connolly LLP  
725 Twelfth Street, N.W.  
Washington, DC 20005  
**VIA EMAIL**

Re: United States v. Elizabeth Holmes and Ramesh “Sunny” Balwani  
CR-18-00258-EJD

Dear Counsel:

On December 16, 2019, Defendant Elizabeth Holmes filed Notice Pursuant to Federal Rule of Criminal Procedure 12.2(b), indicating that she “may introduce expert evidence at trial related to a mental condition bearing on guilt.” On January 14, 2020, the government alerted defense counsel that this notice was insufficient, and requested Defendant Holmes supplement this notice with the following:

- The names, qualifications, and brief general summary of topics to be addressed by the Rule 12.2(b) expert witness(es); and
- The nature of the tests those experts have performed or may be expected to perform.

On January 17, 2020, Defendant Holmes supplemented her Rule 12.2(b) notice in a letter to the government providing the following information: (1) Defendant Holmes has engaged Dr. Mechanic as her expert; and (2) the forensic evaluation “has consisted or will consist of semi-structured and structured interviews focused on the referral questions of whether Ms. Holmes suffered from intimate partner abuse in her relationship with Mr. Balwani during the period of the alleged conspiracy; if so, what was the nature and extent of the abuse; and the psychological effects of such abuse. The MMPI-2 test has been or will be administered on Ms. Holmes.”

During the March 20, 2020, telephonic status conference, counsel for Defendant Holmes indicated to the Court that Defendant Holmes had not yet completed an evaluation pursuant to Rule 12.2(b), and therefore might not be able to provide her Rule 16 disclosures on the date set by the Court months ago. The Court indicated that it was very surprised and disappointed that this evaluation had not yet occurred. The government is similarly perplexed that this evaluation has yet to be completed, especially since Defendant Holmes’s noticed Rule 12.2(b) expert, Dr.

Mindy Mechanic, spent 14 hours conducting an in-person evaluation of Defendant Holmes in August 2019. Moreover, Dr. Mechanic's evaluation of Defendant Holmes covered the exact same set of facts and diagnoses that Defendant Holmes has indicated form the basis of her Rule 12.2(b) defense: the psychological effects of intimate partner abuse.

The government is concerned that the defense deliberately and strategically delayed this second evaluation of Defendant Holmes until after the Court ruled on Defendant Balwani's severance motion. The government is especially concerned with the timing of this second evaluation given that the government objected to severance on the grounds that Defendant Holmes could not establish a Rule 12.2(b) defense, requested the Court conduct a *Daubert* hearing on this issue before granting severance, and submitted its own expert report detailing why the evidence Defendant Holmes had provided her noticed Rule 12.2(b) expert did not support this defense.

Accordingly, the government requests that Defendant Holmes provide the following discovery no later than March 26, 2020:

- All written communications, documents, and other materials to or from Dr. Mechanic addressing Defendant Holmes's Rule 12.2(b) defense.
- Any communications, documents, or materials to or from Dr. Mechanic relating to the Court's order on January 13, 2020, to Defendant Holmes to supplement Dr. Mechanic's declaration to address the Rule 12.2(b) defense.
- All notes taken by Dr. Mechanic during her August 2019 in-person evaluation of Defendant Holmes.
- All raw testing data Dr. Mechanic obtained during her August 2019 evaluation, including the test results for the MMPI-2.
- The names and qualifications of any additional Rule 12.2(b) expert(s) witnesses Defendant Holmes intends to use, and a brief summary of any additional topics to be covered during any additional evaluations.
- The nature of the tests those experts may be expected to perform.

The government further requests Defendant Holmes agree to participate in a government examination pursuant to Rule 12.2(c)(1)(B) to be completed on or before May 7, 2020, under the following conditions:

- The examination will occur over two consecutive days and will be scheduled from 9:00 a.m. to 4:00 p.m. each day with an hour break for lunch.
- The examination will be video recorded.
- No counsel will be present during the examination. No one but Defendant Holmes and the forensic examiner will be present during the examination.
- The examination will occur in a hotel conference room, or other neutral location, to be determined by the parties.<sup>1</sup>
- Dr. Daniel Martell will conduct psychological testing during the first day of the examination.
- Dr. Renee Binder will conduct a psychiatric evaluation during the second day of the examination.

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<sup>1</sup> The examination may be conducted at a private outside location with the forensic examiner seated six feet apart from Defendant Holmes should the current shelter-in-place order remain in place at the time of the examination.

Please respond to this request for a government examination no later than March 26, 2020, or the government will move to compel the examination.

Please contact me if you have any questions about the foregoing.

Very truly yours,

ADAM A. REEVES  
Attorney for the United States,  
Acting Under Authority Conferred  
By 28 U.S.C. § 515

A handwritten signature in black ink, appearing to read 'V. Baehr-Jones', with a stylized flourish at the end.

---

VANESSA BAEHR-JONES  
Assistant United States Attorney



# EXHIBIT 3

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March 26, 2020

Via Email

Ms. Vanessa Baehr-Jones, Esquire  
Mr. John C. Bostic, Esquire  
Mr. Robert Leach, Esquire  
Mr. Jeffrey Schenk, Esquire  
Assistant United States Attorneys  
United States Attorney's Office  
Northern District of California  
150 Almaden Blvd. Suite 900  
San Jose, CA 95113

Re: United States v. Elizabeth Holmes and Ramesh "Sunny" Balwani  
No. CR-18-00258-EJD (N.D. Cal.)

Dear Counsel:

We write in response to your March 24, 2020 letter.

First, we note that we have resolved the specific logistical concern raised by Mr. Wade on March 20, and expect to provide the expert summary on the date set in the scheduling order.

Second, we note that Ms. Holmes has been proceeding on the schedule ordered in the case, which puts her Rule 16(b)(1)(C) summary due on April 29, 2020, more than a month from now. To the extent the government has concerns beyond the logistical issue identified by Mr. Wade, we do not understand them.

Your letter requested various discovery. We can confirm that there are no additional Rule 12.2(b) expert witnesses Ms. Holmes currently intends to use other than Dr. Mechanic. Dr. Mechanic's testing includes the MMPI-2, and her evaluation also includes structured and semi-structured interviews. The remaining requests are at best premature. As repeatedly and previously stated, Ms. Holmes will disclose pursuant to the Federal Rules of Criminal Procedure and on the schedule set by the Court. Ms. Holmes will provide a written summary of the testimony she intends to use with respect to Dr. Mechanic on April 29, the date set by the Scheduling Order. Ms. Holmes will produce further discovery subject to production pursuant to the requirements, and on the timelines established by, Rule 16(b)(1)(A)-(B) and Rule 26.2 and

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Vanessa Baehr-Jones, Esq., *et al.*  
March 26, 2020  
Page 2

the scheduling order. Please describe the purported basis for disclosure of the materials listed in your letter under the Federal Rules of Criminal Procedure, including the basis for providing them at the time requested.

Ms. Holmes cannot voluntarily submit to an examination without an order from the Court. This is important to ensure that Ms. Holmes' Fifth and Sixth Amendment rights, which are implicated by Court-ordered examinations and which are contemplated by the procedural protections in Rule 12.2, remain fully protected.

We are willing to meet and confer with the government to discuss the procedures that might be ordered in the event an examination is ordered by the Court. To that end, we note the following:

- We agree that an examination could occur over two consecutive days from 9:00 a.m. to 4:00 p.m. each day with an hour break for lunch.
- We object to the video recording of any government examination. *See United States v. Christensen*, 2019 WL 1569348, at \*2-3 (C.D. Ill. Apr. 11, 2019); *United States v. Fell*, 2015 WL 13781291 (D. Vt. Oct. 9, 2015). Please note that if the Court orders video recording over Ms. Holmes' objection, we will request (1) two-way recording so that video of both the examiner and Ms. Holmes is captured and (2) simultaneous production to the defense and government of any recording.
- With respect to location, the current health crisis and shelter-in-place orders pose some logistical challenges.
  - First, if the current health crisis continues, we propose that a government examination occur in or near Salt Lake City, Utah. Ms. Holmes is currently visiting Utah with the knowledge and approval of her pretrial services officer. Ms. Holmes was visiting Utah prior to the various California and Bay Area orders, and extended her stay as a result.
  - Second, we agree that a neutral location such as a hotel conference room is an appropriate location for the examination. We are skeptical that an appropriate outside location can be identified that appropriately accounts for weather and privacy and constitutes an appropriate environment for a forensic evaluation. However, we are willing to meet and confer on this point.
- A government examination ordered pursuant to Rule 12.2(c)(1)(B) implicates Ms. Holmes' Fifth and Sixth Amendment rights. An examination that addresses topics beyond those addressed by Ms. Holmes' expert disclosure violates Ms. Holmes' Fifth Amendment rights. Ms. Holmes' Sixth Amendment right to effective counsel regarding an examination requires counsel to be informed regarding the examination. To meaningfully honor both of those rights, the scope of a government examination is

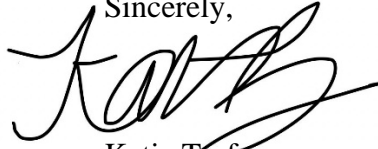
WILLIAMS & CONNOLLY LLP

Vanessa Baehr-Jones, Esq., *et al.*  
March 26, 2020  
Page 3

limited to rebuttal and notice of the topics to be covered in the examination and tests to be performed must be provided in advance. *See, e.g., United States v. Williams*, 731 F. Supp. 2d 1012, 1019-20 (D. Haw. 2010). Accordingly, please identify the specific psychological tests the forensic examiner intends to perform on Ms. Holmes, as well as the particular areas of inquiry.

- We agree that only Ms. Holmes and the forensic examiner will be present during the examination. However, for the purpose of protecting Ms. Holmes' Fifth and Sixth Amendment rights, counsel for Ms. Holmes should be available nearby or by phone (depending on the health circumstances) in the event consultation regarding the examination is needed.
- We object to the government's proposal to subject Ms. Holmes to *two* government examinations with similarly qualified examiners. The government is not entitled to multiple examinations for the purpose of fishing for an expert that supports its position. Please provide a legal and forensic examination basis for this approach.
- If the Court orders an examination, Ms. Holmes will be available on or before May 7.
- Please note that our agreement to any procedures in the event an exam is ordered is, of course, without stipulation to the qualifications of the government's experts on the issue of intimate partner abuse.

Please let us know if you would like to discuss further.

Sincerely,  
  
Katie Trefz

# EXHIBIT 4



**U.S. Department of Justice**

*United States Attorney  
Northern District of California*

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December 4, 2019

Kevin Downey  
Lance Wade  
Williams & Connolly LLP  
725 Twelfth Street, N.W.  
Washington, DC 20005  
**VIA EMAIL**

Re: United States v. Elizabeth Holmes and Ramesh "Sunny" Balwani  
CR-18-00258-EJD

Dear Counsel:

The government learned for the first time yesterday, December 3, 2019, that defendant Elizabeth Holmes anticipates raising a mental defect defense and filing and serving a Rule 12.2(b) notice. (See enclosed Coopersmith declaration and exhibit.) Although defendant Holmes's letter to defendant Balwani is dated September 18, 2019, the December 4, 2019, email to the government from Balwani's counsel, containing the enclosed declaration, was the first notice the government has received of this potential defense. We have requested notice of Ms. Holmes's intention to rely on a defense involving mental condition in no fewer than ten discovery letters between August 2018 and September 2019. We again reiterate our request for notice of any intention of your client to rely on an entrapment defense or a defense involving mental condition or duress, and/or an alibi defense for offenses which occurred on or about the dates alleged in the indictment, so that the government may have an opportunity to respond.

The government further requests that the parties agree to the following schedule in order to facilitate defense and government examinations of defendant Holmes and provide subsequent briefing on the admissibility of the Rule 12.2(b) defense to the Court:

Defense 12.2(b) Notice:	December 16, 2019
Defense Rule 12.2(b) Discovery and Expert Report Due:	January 13, 2020
Government Examination of Defendant Holmes:	February 24, 2020 (or earlier depending on scheduling)
Government Expert Report Due:	March 30, 2020

Motions regarding Rule 12.2(b) defense: April 24, 2020  
Responses regarding Rule 12.2(b) defense: May 11, 2020  
Replies regarding Rule 12.2(b) defense: May 25, 2020

This letter also serves as a request to preserve and produce in discovery any and all documents, materials, audio and video recordings, and other records relating to the defense Rule 12.2(b) examination and evaluation of defendant Holmes. Specifically:

- (1) Any notes taken by any defense expert during the examination and evaluation of defendant Holmes;
- (2) Any audio or video recordings of the defense expert's examination and evaluation of defendant Holmes;
- (3) All raw data from any tests that any Rule 12.2(b) defense expert administered to defendant Holmes, including scoring, norming, and interpretative reports;
- (4) All documents shown to any expert retained to evaluate Holmes for purposes of the Rule 12.2(b) defense, to include evidence or documents in this case, medical or counseling records and any other records relating to defendant Holmes' Rule 12.2(b) defense, and any communications between the defense expert and defendant Holmes;
- (5) A list of all dates and times on which defendant Holmes has met with any Rule 12.2(b) defense expert regarding the Rule 12.2(b) defense; and
- (6) Any other records or materials pertinent to the facts of the Rule 12.2(b) defense, to include any police reports, email or text communications, notes, or other documents.

The government also requests that—to the extent the defense has not already done so—the defense video and audio record any examinations, evaluations, and/or meetings between defendant Holmes and any retained defense expert regarding the Rule 12.2(b) defense.

Finally, based on your September 18, 2019, letter, it appears that many of the under seal filings in this matter relate to Ms. Holmes's intention to assert a mental defect defense. Whatever justification there may have been for keeping these from the government no longer exists. We therefore request that you consent to any sealing order being modified to permit disclosure to the government.

Please contact me if you have any questions concerning the foregoing.

Very truly yours,

ADAM A. REEVES  
Attorney for the United States,  
Acting Under Authority Conferred  
By 28 U.S.C. § 515

/s/

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VANESSA BAEHR-JONES  
Assistant United States Attorney

Enclosure